

Certification Process of EPA TSCA Title VI Third-Party Certification Program (EPA TSCA Title VI 第三方认证方案认证流程)

适用法定范围:

TÜV Rheinland (China) Ltd.
TÜV Rheinland (Shenzhen) Co., Ltd.

适用业务范围:

P.01 Softlines

适用过程范围:

6.3 Service Delivery : 6.3.3 Certification

1. 目的

本文件描述了莱茵检测认证服务（中国）有限公司作为 EPA TSCA Title VI 第三方认证机构，根据[美国《联邦法规汇编》第 40 篇 770 部分《复合木制品甲醛释放限量标准》](#)提供 EPA TSCA Title VI 第三方认证方案的整体流程。该流程必须遵守以下法律法规（包括但不限于）：

- 《中华人民共和国认证认可条例》
- 《认证机构管理办法》
- 《认证证书和认证标志管理办法》

本作业指导书规定了莱茵检测认证服务（中国）有限公司实施 EPA TSCA Title VI 第三方认证方案所需的步骤，这些步骤是在全球认证流程文件 MS-0020192 中定义的基础上进一步补充的。

2. 术语定义和缩写

| 术语/缩写 | 描述 |
|-----------------------|--|
| EPA | 美国环境保护署 |
| EPA TSCA Title VI TPC | EPA TSCA Title VI 第三方认证机构，指提供产品认证服务和实验室测试服务(直接或通过合同服务)的合格评定机构，由 EPA TSCA Title VI 产品认可机构和 EPA TSCA Title VI 实验室认可机构认可(除非实验室测试服务与 EPA TSCA Title VI 实验室认可机构认可的实验室签订合同)，并根据 40 CFR PART 770.7(c)获得 EPA 承认。 |
| TR China | EPA TSCA Title VI TPC，全称“莱茵检测认证服务（中国）有限公司”，TPC 号码为 EPA-TPC-100。 |
| 质量控制限值或 QCL | 指根据 ASTM E1333-14 方法或根据 40 CFR PART 770.20(d)显示等效性的 ASTM D6007-14 方法进行的质量控制方法测试的相关等效值。 |

3. 适用范围

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本文件适用于在美国生产(包括进口)、分销和销售的任何复合木制品, 以及含有这些材料的部件或成品, 包括在制造房屋中使用或安装的复合木制品。

复合木制品分类表 (表 1) (摘自 CNAS-SC26) :

| 大类 | 中类 | 内容 |
|----------|-------|---------|
| 01 复合木制品 | 01.01 | 胶合板 |
| | 01.02 | 刨花板 |
| | 01.03 | 中密度纤维板 |
| | 01.04 | 薄中密度纤维板 |
| 02 贴面制品 | 02.01 | 贴面制品 |

*注:

1. 硬木胶合板, 刨花板, 中密度纤维板, 薄中密度纤维板和贴面制品视为不同的认证单元。
2. 同一制造商、同种产品但不同生产线的产品应作为不同的认证单元。
3. 同一制造商、同种产品但不同生产厂址的产品应作为不同的认证单元。

EPA TSCA Title VI 第三方认证方案属于 ISO/IEC 17067 中定义的类型 5 方案。其具体认证模式是型式试验 + 初始工厂检查 + 监督。

4. 工作步骤

4.1 申请 (step 200-300)

4.1.1 接收客户问询 (step 200)

销售部门收到来自申请人(如制造商, 授权代表)关于出口到美国市场或在美国制造或销售的复合木制品的产品认证的问询。

销售人员将申请认证所需的所有信息发送给客户, 并提供相应的申请表。

申请材料至少应包含以下信息:

- 1) 客户拟申请的认证类型: EPA复合木制品认证、EPA复合木制品认证-无醛豁免认证或低醛豁免认证等;
- 2) 板材生产商的名称、地址、电话号码及其他联系方式;
- 3) 板材生产商质量控制经理姓名及联系方式;
- 4) 申请认证的具体产品, 以及板材生产中所用到的胶粘剂类型;
- 5) 板材生产商内部质量控制体系相关文件, 如质量控制手册、内部质量控制记录等;
- 6) 板材甲醛排放检测报告 (如有)。

4.1.2 核对问询 (step 300)

需要核对以下信息:

- 1) 核实客户未在“严重违法失信单位”名单中 [国家企业信用信息公示系统](#)

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- 2) 初步核对客户提交的申请材料是否齐全，板材生产商是否对 EPA 复合木制品认证和 40 CFR PART 770 的相关要求有适当的了解。所有与提供认证服务相关的项目信息都要上传 ComPASS 文档管理系统。

4.2 申请评审 (step 400-1000)

在申请人提交符合性评估申请并提供必要的信息、数据及文件后，认证机构需要确保：

- 1) 申请所提供的信息是充分的；
- 2) 能够确定与产品、标准、法规和其他规范性文件相关的认证范围；
- 3) 机构具备执行所有合格评定活动所需的资质和能力。

4.2.1 确定认证范围 (step 400)

接收到客户申请材料的人员（如工程师或技术专家）对申请认证的木制品是否适合做 EPA 认证做出评估，不在 EPA 认证范围的木制品参见 770.1(c)。相关人员还应检查申请所提供信息的充分性，以能够明确界定认证范围。

4.2.2 标准产品 (step 500)

见本文件表 1。

4.2.3 打开新的申请评审档案 (step 600)

为了进行申请评审和报价准备，需要 ComPASS 中建立一个新的项目文件，并在其中上传接收到的认证申请文件。任务将被发送给申请评审人员以检查提交的信息。

4.2.4 评审提交的信息 (step 700)

申请评审人员（通常为认证复核或认证决定人员）对客户提交的申请材料进行评审，评审内容应包括：

- 1) 产品描述是否清晰，包括产品名称、型号、厚度、所用胶粘剂类型等；
- 2) 产品型号系列中各型号之间的差异；
- 3) 板材生产商的质量控制文件和记录；
- 4) 板材甲醛排放测试报告（如有）；
- 5) 是否需要额外的资源来进行必要的测试；

4.2.5 受理 (step 800)

如果认证申请评审通过，则认证申请可以受理。

如果认证申请不能批准，需要拒绝认证并告知客户理由。客户申请材料不符合要求的，需重新启动申请流程并通知申请人对材料进行补充完善。

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4.2.6 发布报价单并签署报价单 (step 900)

向客户提交详细的报价单，包括与认证相关的所有信息和活动，如评价阶段涉及的有关认证活动和可能使用的分包方的相关信息。

指定的销售人员向申请人提供报价单及需签署的认证协议。

在 ComPASS 中输入相关信息。

注：证书持有人（包括共同证书持有人）与 TÜV 莱茵（中国）之间应签订通用协议。通用协议的模板见 [TÜV Rheinland\(CN\) 主页](#)。

4.2.7 建立订单 (step 1000)

当客户签署并返回报价，且客户同意报价内容及所有相关信息后，指定人员应在 ComPASS 中建立订单。

4.3 评价 (step 1100-1600)

评价阶段始终基于评价计划。评价计划依据认证方案和特定产品的产品要求制定。此评价计划至少包含以下内容：需要进行认证的产品、规定产品要求的标准、法规及其他规范性文件、用于评价生产过程的方法和程序。评价计划还包括具体任务的时间安排。相应的评价任务包括设计和文档审查、抽样、测试、检查和审核等活动。

如果评价计划与客户签署的合同之间存在任何差异，则应启动新的申请评审和报价。如果评价过程中涉及的相关方发生变更（与合同相比），则在评价开始前应通知申请人并征得其批准。

注：只有在报价中明确包含以上提到的内容，报价才可以被视为评价计划。

4.3.1 检测 (step 1100)

对于季度测试，EPA TSCA Title VI TPC 必须仅使用已通过 EPA TSCA Title VI 实验室认可机构（Laboratory AB）认可的实验室，并且这些实验室须参与 CARB 组织的甲醛释放量实验室间比对项目（如果提供），或参与 EPA 认可的能力验证或实验室间比对项目（如果有）。

4.3.1.1 测试的一般要求须符合 770.20 a

- 1) 所有板材必须在涂饰或面漆应用之前进行测试。用于测试的板材的调节必须在板材生产后尽快开始，但不得晚于板材生产后 30 个自然日内。
- 2) 进行本节要求的甲醛测试的设施必须遵循所使用测试方法的程序和规范，例如测试条件和装载比。
- 3) 用于本节要求的甲醛测试的所有设备必须按照设备制造商的说明进行校准、维护，并按要求使用。

4.3.1.2 季度测试要求须符合 770.20 c

季度测试必须由 EPA TSCA Title VI TPC 监督并由 TPC 实验室执行。

1) 允许的方法

季度测试必须通过 ASTM E1333-14 测试方法（参见 770.99，作为参考纳入）进行，或者，在符

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合本节第 (d) 段规定的等效性证明的前提下, 通过 ASTM D6007-14 测试方法 (参见 770.99, 作为参考纳入) 进行。

2) 样品选择

- 样品必须由 EPA TSCA Title VI TPC 随机选取。
- 每种认证产品类型必须选取样品进行季度测试。对于胶合板样品, 需从板材生产商生产的能够代表甲醛释放范围的产品中随机选择样品。
- 样品不得包括复合木制品捆的顶部或底部产品。
- 测试结果可以是单一测试舱的值, 或者, 如果使用 ASTM D6007-14 测试装置, 可以是代表整个板材均匀分布部分的 9 个试样的测试平均值。这 9 个试样必须分为 3 组进行测试, 得到 3 个数据点, 然后将这 3 个数据点的平均值作为这些试样所代表板材的测试值。

3) 样品处理

在样品选取与测试调节开始之间, 样品必须紧密堆叠或气密包装。样品必须贴上标签, 由 EPA TSCA Title VI 认证机构签字, 密封捆绑, 用聚乙烯包裹, 外加保护罩, 并快速运输到 TPC 实验室。样品调节必须尽快开始, 但不得晚于样品生产后 30 个自然日。

4) 测试结果

任何超过 770.10 所规定的适用甲醛排放标准的样品, 必须由 EPA TSCA Title VI 认证机构在 72 小时内以书面形式报告给板材生产商, 并按照 770.8 规定报告给 EPA。对于由样品结果代表的任何超过适用甲醛排放标准的批次, 板材生产商必须遵守 770.22 的要求。如果多个产品被归为单一产品类型进行测试, 则包括该样品所代表组内的所有产品。

5) 减少测试频率

经 EPA TSCA Title VI 认证机构或 CARB 依据 770.18(c) 批准减少测试频率的复合木制品, 每六个月只需进行一次季度测试。

4.3.1.3 样品的运输及处理须符合 770.24 a

复合木制品可以被运输到美国境内或跨越美国进行质量控制或季度测试。单纯为了质量控制或季度测试而将复合板材运输到或跨越美国的认证机构 (TPCs) 在 770.7(c)(3)(i) 的范围内不被视为进口商或分销商或进口商。

- 这些板材在根据 770.17、770.18 或 770.20 进行测试之前, 不得出售、提供销售或供应给 TPC 实验室以外的任何实体。
- 如果此类产品的测试结果符合本小节中的排放标准, 则这些板材可以根据 770.45 重新贴标并进行销售、提供销售或供应。

测试报告应保存在 ComPASS 中。

4.3.2 工厂检查 (step 1200)

初始及监督工厂检查人日数均为 1 人日。

检查内容应至少包括:

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4.3.2.1 质量控制手册、设施、人员应符合 770.21

1) 质量控制手册

a) 每个板材生产商都必须具备书面的质量控制手册。手册内容至少应包括以下内容:

- (i) 质量控制部门的组织结构描述, 包括质量控制经理和质量控制员工的姓名;
- (ii) 一个描述必须遵循的抽样程序;
- (iii) 一个描述样品处理方法的内容, 包括分析质量控制样品的具体最长时间期限;
- (iv) 质量控制测试的频率描述;
- (v) 一个描述由于生产变化导致的甲醛释放变化检测程序的内容 (例如, 树脂比例的增加、树脂中甲醛/尿素摩尔比的增加或压制时间的减少);
- (vi) 关于额外测试的规定描述;
- (vii) 一个记录保存程序的描述;
- (viii) 一个标签程序的描述;
- (ix) 每种产品类型的树脂平均比例和压制时间;
- (x) 产品类型的描述, 及 (若适用) 每种产品类型下涉及的产品变量描述;
- (xi) 减少质量控制测试的程序 (若适用);
- (xii) 不符合批次处理程序的描述, 包括生产商如何确保遵守 770.22(d)(1) 通知要求的描述。

b) 质量控制手册必须经过 EPA TSCA Title VI 认证机构 (TPC) 的批准。

2) 质量控制设施

每个板材生产商都必须指定一个质量控制设施, 用于进行甲醛测试的质量控制。

- a) 质量控制设施可以是 EPA TSCA Title VI 认证机构 (TPC)、合同实验室, 或生产商自有并运营的实验室。
- b) 每个质量控制设施必须配备具有充分经验和/或培训的质量控制员工, 以执行准确的化学定量分析测试。质量控制经理必须向 EPA TSCA Title VI 认证机构 (TPC) 识别每位负责进行甲醛质量控制测试的人员。

3) 质量控制经理

每个板材生产商都必须指定一名具有充分经验和/或培训的人员为质量控制经理, 负责甲醛排放质量控制。

质量控制经理必须:

- a) 拥有采取必要措施以确保持续满足适用于甲醛排放标准的权限;
- b) 向负责监督质量控制测试的 EPA TSCA Title VI 认证机构 (TPC) 报备其身份。若质量控制经理的身份发生变化, 生产商必须在十个自然日内以书面形式通知 EPA TSCA Title VI 认证机构 (TPC), 并提供新任质量控制经理的资格证明;
- c) 审核并批准生产相关的所有质量控制测试报告;
- d) 确保样品按照质量控制手册中规定的程序进行采集、包装和运输;
- e) 在任何影响甲醛排放的重大生产变化发生后的 72 小时内, 以书面形式通知 EPA TSCA Title VI 认证机构 (TPC)。

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4.3.2.2 质量控制测试须符合 770.20 b

1) 允许的方法:

质量控制测试必须使用以下任何一种方法进行, 并根据本节第 (d) 段的规定证明每种方法的相关性:

- a) ASTM D6007-14 (参见 770.99, 作为参考纳入)。
- b) ASTM D5582-14 (参见 770.99, 作为参考纳入)。
- c) BS EN ISO 12460-3:2020 (参见 770.99, 作为参考纳入) 或 ISO 12460-3:2020(E) (参见 770.99, 作为参考纳入)。
- d) DMC 2007 用户手册 (参见 770.99, 作为参考纳入)。
- e) DMC 2012 GP 用户手册 (参见 770.99, 作为参考纳入)。
- f) BS EN ISO 12460-5:2015 E (穿孔器法) (参见 770.99, 作为参考纳入)。
- g) JIS A 1460:2021(E) (24 小时干燥器法) (参见 770.99, 作为参考纳入)。

2) 测试频率

a) 刨花板和中密度纤维板必须在每个生产班次 (八小时或十二小时, 生产时间误差正负一小时) 内, 每条生产线、每种产品类型至少测试一次。此外, 还必须在以下情况下进行质量控制测试:

- (i) 某种产品类型的生产结束, 即使生产时间未达到八小时;
- (ii) 树脂配方发生变化, 导致甲醛对尿素的比例增加;
- (iii) 使用的甲醛树脂数量 (以平方英尺或板材计算) 增加超过 10%;
- (iv) 指定的压制时间减少超过 20%; 或
- (v) 质量控制经理或质量控制员工认为生产的板材可能无法满足相关标准的要求。

b) 如果刨花板和中密度纤维板生产商能够证明其生产操作保持一致且测试值的变异性较低, 则可申请减少质量控制测试频率:

(i) 为获得资格, 生产商必须:

- (A) 向 EPA TSCA Title VI 认证机构 (TPC) 提交书面申请;
- (B) 并保持 30 块板材的滚动平均值。

(ii) 关于减少质量控制测试频率, EPA TSCA Title VI 认证机构:

- (A) 如果 30 块板材的滚动平均值在过去连续 60 个自然日或更长时间内保持在指定质量控制极限 (QCL) 以下两倍标准差内, 可批准将测试频率减少为每 24 小时生产周期进行一次质量控制测试;
- (B) 如果 30 块板材的滚动平均值在过去连续 60 个自然日或更长时间内保持在指定质量控制极限 (QCL) 以下三倍标准差内, 可批准将测试频率减少为每 48 小时生产周期进行一次质量控制测试;
- (C) 只要生产商提交的数据表明符合标准, 并且 EPA TSCA Title VI 认证机构没有其他理由认为数据不准确或生产商的生产过程不足以确保持续符合排放标准, 就会批准减少质量控制测试的请求;
- (D) 如果测试或检查表明生产商无法保持生产一致性或测试值变异较低的特性, 将撤回减少测试频率的批准。

c) 胶合板必须按照以下要求进行测试:

- (i) 如果生产商的周胶合板生产量在 10 万至 20 万平方英尺之间, 每种产品类型每周至少测试一次;
- (ii) 如果生产商的周胶合板生产量在 20 万至 40 万平方英尺之间, 每种产品类型每周至少测试两次;

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- (iii) 如果生产商的周胶合板生产量达到 40 万平方英尺或以上，每种产品类型每周至少测试四次；
- (iv) 如果生产商的周胶合板生产量不超过 10 万平方英尺，则每生产 10 万平方英尺的每种产品类型至少测试一次；如果某种特定产品类型的生产量少于 10 万平方英尺，则该产品类型每个月每被生产一次至少进行一次质量控制测试；
- (v) 在以下情况下也必须进行质量控制测试：
- (A) 树脂配方发生变化，导致甲醛对尿素的比例增加；
 - (B) 使用的甲醛树脂数量（以平方英尺或板材计算）增加超过 10%；
 - (C) 粘合剂施胶量增加超过 20%；
 - (D) 指定的压制时间减少超过 20%；或
 - (E) 质量控制经理或质量控制员工认为生产的板材可能无法满足相关标准的要求。
- d) 根据 770.18(b)至(c)获得 EPA TSCA Title VI TPC 或 CARB 批准减少测试频率的复合木制品，每种产品类型以及刨花板和中密度纤维板的每条生产线，每周至少测试一次，但符合本节(b)(2)(iii)(D)段条件的胶合板生产商可以继续按照该条款执行质量控制测试。

3) 测试结果

任何测试结果超过根据 770.7(c)(4)(i)(C)设定的质量控制极限 (QCL) 必须在 72 小时内由 EPA TSCA Title VI 认证机构以书面形式报告给 EPA 和板材生产商。对于由质量控制样品代表的任何超过质量控制极限的批次，板材生产商必须遵守 770.22 的要求。如果多个产品被归为单一产品类型进行测试，则包括由该样品代表的组内所有产品。

4.3.3 不符合项? (step 1300)

需要确定被测试产品是否符合要求，或者是否存在任何不符合项。当在产品测试和/或工厂检查中发现偏差时，制造商将收到一份详细的偏差报告，并需要在截止日期之前纠正这些偏差。

4.3.4 不符合项确凿? (step 1400)

当通过监督或其他方式证实与认证要求的不符合项时，认证机构应考虑并决定适当的措施。根据 ISO/IEC 17065:2012/条款 7.11.1，适当的措施可以包括以下内容：

- 1) 按认证机构规定的条件继续认证（例如，增加监督频次）；
- 2) 缩小认证范围，移除不合规的产品变型；
- 3) 暂停认证，等待客户采取补救措施；
- 4) 撤销认证。

4.3.5 将不符合项的结果提交给客户(step 1500)

不符合项会告知客户，客户需要表示是否愿意继续认证程序。如果客户表示愿意继续执行认证程序，则会提供一份评估报告，其中包含验证纠正措施所需的额外评估任务。在提交新的评估计划之前，必须核实是否需要执行第 900 步（出具报价单并签署报价单）。

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4.3.6 验证纠正措施计划(step 1600)

应验证客户是否根据其纠正措施计划在规定的时间内采取了纠正行动和措施以解决所有不符合项。一个经过修改的新样品以及说明如何处理不符合项的描述可以被视为纠正措施计划。验证可能会引发需要执行步骤 1100 (评价) 和/或步骤 1200 (工厂检查) 的需求。根据所需的纠正措施, 评价需彻底进行, 或者仅针对导致偏差报告的部分进行。客户将被及时告知验证结果。

4.4 复核 (1700-1900)

4.4.1 确定符合性证据 (步骤 1700)

4.4.1.1 申请 EPA 复合木制品认证须符合 770.10 b 中要求的甲醛释放限值。

- 1) 胶合板 (单板芯或复合芯制成) $\leq 0.05\text{ppm}$
- 2) 中密度纤维板 $\leq 0.11\text{ppm}$
- 3) 薄中密度纤维板 $\leq 0.13\text{ppm}$
- 4) 刨花板 $\leq 0.09\text{ppm}$

4.4.1.2 申请无醛豁免认证须符合 770.17 c 中要求的甲醛释放限值及 770.17 a 中的要求:

- 1) 硬木胶合板 $\leq 0.05\text{ ppm}$, 刨花板、中密度纤维板、薄中密度纤维板 $\leq 0.06\text{ ppm}$ 。
- 2) 在三个月的常规质量控制测试数据中, 有 90% 的数据以及通过一级或二级测试方法 (参见 40 CFR PART 770.17 (a)) 进行的检测结果, 都不可高于 0.04 ppm。

使用无添加甲醛树脂制造复合木制品板材的生产商, 可以向 EPA TSCA Title VI TPC 或加州空气资源委员会 (CARB) 申请两年的测试豁免 (770.20) 以及认证豁免 (770.15 和 770.40(b))。申请必须包含以下内容:

- 1) 板材生产商的名称、地址和电话号码。
- 2) 对特定产品及其树脂体系的说明。
- 3) 至少一次由 EPA TSCA Title VI TPC 监督下, 依据 ASTM E1333-14 或 ASTM D6007-14 测试方法 (参考文献见 770.99) 进行的测试。通过 ASTM D6007-14 获得的测试结果, 必须按照 770.20(d)(1) 要求证明其结果的等效性。
- 4) 三个月内根据 770.20 进行的常规质量控制测试数据, 包括依据 770.20(d)(2) 要求的相关性证明, 总计不得少于十三次质量控制测试。

4.4.1.3 申请超低甲醛豁免认证须符合 770.18 c 或 770.18 d 中要求的甲醛释放限值及 770.18 a 中的要求:

- 1) 硬木胶合板 $\leq 0.05\text{ ppm}$; 刨花板 $\leq 0.08\text{ ppm}$; 中密度纤维板 (MDF) $\leq 0.09\text{ ppm}$; 薄中密度纤维板 (thin MDF) $\leq 0.11\text{ ppm}$ 。
- 2) 根据本节第(a)(4)段要求的六个月常规质量控制测试数据的 90%, 刨花板 $\leq 0.05\text{ ppm}$, 中密度纤维板 $\leq 0.06\text{ ppm}$, 薄中密度纤维板 $\leq 0.08\text{ ppm}$ 。
或者:

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对于硬木胶合板 ≤ 0.05 ppm; 对于刨花板、中密度纤维板和薄中密度纤维板 ≤ 0.06 ppm:

- 1) 六个月的常规质量控制测试数据的90%，以及两次季度一级或二级方法测试的结果（根据本节第(a)(3)和(4)段的要求）必须显示甲醛排放不高于超低排放甲醛树脂（ULEF）的目标值0.04 ppm。
- 2) 使用超低排放甲醛树脂制造复合木制品板材的生产商，可以向 EPA 《有毒物质控制法》（TSCA）第 VI 标题认可的第三方认证机构（TPC）或加州空气资源委员会（CARB）申请批准，以下两项之一：
 - a) 进行比 770.20 规定频率更低的测试，或者
 - b) 获得两年的测试豁免（770.20）和认证豁免（770.15 和 770.40(b)）

申请必须包含以下内容：

- 1) 板材生产商的名称、地址和电话号码。
- 2) 对具体产品类型及其树脂体系的说明。
- 3) 至少两次由 EPA TSCA Title VI TPC 监督下，根据 ASTM E1333-14 或 ASTM D6007-14 测试方法（参考文献见 770.99）进行的测试。通过 ASTM D6007-14 获得的测试结果，必须按照 770.20(d)(1)要求证明其结果的等效性。
- 4) 六个月内根据 770.20 进行的常规质量控制测试数据，包括依据 770.20(d)(2)要求的相关性证明，总计不得少于二十六次质量控制测试数据。
- 5) 认证机构应指定至少一人对与评价相关的所有信息和结果进行复核。复核应由公正且未参与评价过程的人员实施。

4.4.2 推荐认证？（步骤 1800）

复核人员在复核与评价有关的所有信息、文件和结果后，应决定是否推荐认证。如果产品和评价文件符合要求，则复核人员推荐认证。如果不符合以下要求，推荐拒绝认证可能会触发步骤 1300（不符合项）或根据步骤 1100 和/或 1200 进行新的或额外的评价。

4.4.3 推荐认证（步骤 1900）

根据复核做出的认证决定推荐应记录在认证检查表中。认证推荐将输入 ComPASS。

4.5 认证决定（2000-2200）

4.5.1 做出决定认证（步骤 2000）

一旦复核人员在 ComPASS 和 SAP CORE 中上传并发布了文档和认证推荐，认证决定人员将在 ComPASS 中收到一项任务。如果认证被认证决定人员授予，他/她将在 SAP CORE 中将状态切换为状态 14。

在必要情况下，他/她可以要求复核人员检查证书内容的技术正确性。

最后，认证决定人员应确保所有认证方案的要求均已得到遵守。SAP CORE 中的所有相关信息随后将被传输至 CERTIPEDIA。MS-0043417 附件 2 认证检查表是进行认证决定和记录相关内容的详细计划和指南。认证决定将被记录在 ComPASS 中，同时需上传任何其他相关文件，特别是已完成的认证检查表。

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注意: 做出认证决定的人员必须不同于参与评价的人员。然而, 复核和认证决定可以由同一人或同一组人员同时完成。

4.5.2 授予认证? (步骤 2100)

如果已获得认证, 则继续颁发证书步骤 2200(签发证书和所需信息)。相反, 如果无法颁发证书, 则根据拒绝的原因, 要么向客户提供一份偏差报告, 要么分别重复步骤 1100(评价)和步骤 1200(工厂检查)。根据客户的答复, 应采用以下选项:

- 选项 1: 如果客户决定继续认证, 流程将回到测试(步骤 1100);
- 选项 2: 如果客户决定不再继续认证流程, 则关闭项目并开具发票。

4.5.3 签发证书和所需信息(步骤 2200)

如果认证得到批准, 则向认证申请方颁发 EPA 复合木制品认证证书。

认证证书应包含以下信息:

- 认证机构的名称和地址;
- 证书持有人的名称和地址;
- 生产场所的名称和地址;
- 证书编号;
- 证书的签发日期和有效期(有效期为 1 年);
- 产品名称;
- 产品的技术信息, 包括规格、型号、厚度;
- 认证依据;
- 认证模式;
- EPA TPC 编号;
- 证书签发人员姓名。

注意: 如果认证机构已获得 EPA 承认的认可机构的认可, 则证书上应包含认可标志。如果客户希望证书上不带有认可标志, 则客户必须向认证机构和认可机构解释其原因。如认证机构和认可机构均认为客户的理由合理且可以接受, 则可酌情处理。

4.6 监督 (step 2300-2900)

4.6.1 测试、检查和审核 (step 2300)

监督活动包括产品抽样检测和监督工厂检查, 频率为每季度一次。

1) 季度检测

TR China 委派指定实验室运用 ASTM E1333-14 或 ASTM D6007-14 标准对抽样样品进行季度检测, 并与板材生产厂的质量控制检测结果进行比对, 以验证生产厂的甲醛质量控制测试的准确性, 并

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根据 40 CFR PART 770.20 的要求评价检测方法的等同性和相关性。季度检测抽样及测试要求同本认证方案 4.3.1.

注：对于季度性检测，TR China 只可使用经 EPA 承认的认可机构认可的实验室，并且须验证该实验室对 EPA 复合木制品认证要求所做的甲醛释放测试的准确性。

2) 季度工厂检查

TR China 派遣有资质的检查员对生产厂及其产品和记录进行季度工厂检查，检查应重点关注生产厂是否持续符合 40 CFR PART 770. 20, 770. 21, 770. 22, 770. 24, 770. 40 及 770. 45 的相关要求。

4.6.2 不符合项? (step 2400)

需要确定是否在监督活动中存在不符合项。如果没有不符合项，则可以继续进行步骤 2900。

4.6.3 经证实的不符合项? (step 2500)

当通过监督或其他方式证实存在不符合认证要求的情况时，认证机构应考虑并决定采取适当的措施。根据 ISO/IEC 17065: 2012 第 7.11.1 条款，适当的措施可包括以下内容：

- 1) 在认证机构规定的条件下继续认证（例如增加监督频率）；
- 2) 缩小认证范围，以去除不合格的产品型号；
- 3) 暂停认证，等待客户采取纠正措施；
- 4) 撤销认证。

4.6.4 向客户提交不合格结果 (step 2600)

不符合项以及纠正措施的时间期限将通知客户。如果客户表示希望继续认证流程，他应提供与规定期限相关的纠正措施计划。

4.6.5 验证纠正措施计划 (step 2700)

需要验证客户是否根据其纠正措施计划在规定的时间内采取了纠正行动和措施以解决不符合项。客户将收到相应的监督报告。

4.6.6 通过 (纠正措施被接受) ? (step 2800)

如果客户提交的纠正措施计划满足了所有认证要求，则可以维持认证。如果未满足认证要求，则流程返回到评价阶段 (step 1100) 。

4.6.7 维持认证 (step 2900)

如果监督结果符合要求，则可以维持认证证书的有效性，并颁发持续监督证明 POCC。

EPA 复合木制品认证证书的有效期为 1 年。

在规定的有效期结束时，证书自动过期。在这种情况下，客户不需要被另行通知。

如果客户希望更新认证，通常可以在到期前 2 个月开始提交申请。

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4.6.7.1 对于无醛豁免认证 770.17 e:

在初次豁免的两年期限结束后，以及之后每两年一次，为了继续满足测试和认证要求的豁免条件，板材生产商必须重新向 EPA TSCA Title VI TPC 或 CARB 申请，并根据本部分第(a)(3)段进行至少一次测试，且测试结果需符合本部分第(c)(1)段中的排放标准。

4.6.7.2 对于超低甲醛豁免认证 770.18 g:

在初次豁免的两年期限结束后，以及之后每两年一次，为了继续满足测试和认证要求的豁免条件，板材生产商必须重新向 EPA TSCA Title VI TPC 或 CARB 申请，并根据本部分第(a)(3)段进行至少两次测试，且测试结果需符合本部分第(d)(1)段中的排放标准。

4.7 影响认证的变更

作为一般流程，任何变更的批准都将通过签发原始证书的修订版来确认，作为现有证书编号的附加“页”（即 SAP CORE 编号为 CP xxxxxxxx 0002, CP xxxxxxxx 0003...），其中应包含以前证书页的完整和更新信息。新证书“页”的有效日期与原始证书保持一致。

4.7.1 获证产品的变更

板材生产商应通知 TR China 对批准类型的任何变更，这些变更可能会影响产品符合现行相应标准的基本要求或证书的有效性条件，特别是在生产工艺、认证产品的原材料或结构发生变更的情况下。

此类变更需要 TR China 的额外批准，持证方应详细描述所有更改并按要求提交证明文件。

变更后的产品与原认证产品之间的差异应重新评估，该过程遵循与新申请相同的步骤，并适当考虑所有现有的合格评定结果。

4.7.2 认证要求的变更

TR China 作为 EPA TSCA Title VI TPC 应确保自身及其客户了解关于产品标准、法律法规和被广泛认可的技术现状的任何变更。

此类变更应直接或通过 TUV 莱茵办事处通知客户。

经客户申请，在申请评审过程中如果确定需要进行进一步的评价活动(样品检验、检测、文件审核等)，TR China 应通知客户。

对原认证产品重新进行评价，流程遵循与新申请相同的步骤，并适当考虑所有现有的合格评定结果。

如果客户未申请重新评价产品，则在 TR China 规定的过渡期届满后，认证将被取消，并更新记录。

4.8 扩大或缩小认证范围

“认证范围”可指产品名称、产品型号/类型、板材厚度、板材生产厂等。

变更认证范围的批准将按照 4.7 进行确认。

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4.8.1 缩小认证范围

如果申请人申请缩小认证范围(例如取消型号), 则重新评估已认证产品的缩小范围与原始范围之间的差异, 并按照与新申请相同的步骤进行流程, 同时适当考虑所有现有的合格评定结果。

4.8.2 扩大认证范围

如果申请人申请扩展认证范围(例如增加型号、增加生产地址), 则重新评估认证产品的扩展范围与原始范围之间的差异, 并且流程遵循与新申请相同的步骤, 并适当考虑所有现有的合格评定结果。

4.9 认证的终止、暂停和撤销

在协调相关业务领域后, 认证机构、标识监督团队或商业订单处理团队可基于以下原因, 决定是否需要终止、暂停或撤销 EPA 复合木制品认证:

- 客户或其制造工厂被列入“严重违法失信单位”名单中 [国家企业信用信息公示系统](#)
- 测试要求发生变更;
- 测试中发现不符合项, 或未报告产品或质量管理体系的相关变更;
- 在后续检查、样品检验或审核中发现不符合项;
- 拒绝进入生产场所、存储设施或需审核的区域;
- 滥用认证, 例如错误引用认证内容, 或误导性使用证书和测试标志;
- 拒绝提供访问相关记录的权限;
- 未支付相关费用;
- 未履行向认证机构报告需报告事件的义务。

如果需要根据上述任一原因采取行动, 根据职责分工, 标识监督团队、商业订单处理团队或认证机构将启动相关问题处理流程, 通常会邀请相关认证决定人员参与。将应在合理时间内努力澄清情况。如果问题无法解决, 且前述问题仍然存在致使必须终止、暂停或撤销 EPA 复合木制品认证证书, 认证机构、标识监督团队或商业订单处理团队将终止、暂停或撤销 EPA 复合木制品认证证书, 并在核心系统 (CORE 系统) 中发起相关证书的撤销或取消程序。如有必要, 还会通知相关主管部门或其他认证机构。

4.9.1 认证的终止

根据客户的请求, EPA 复合木制品认证可以在其有效期结束之前终止。证书持有人应向 TR China 提交书面的终止请求。

注: 证书持有人无权要求退还已经支付的产品认证注册费用。

4.9.2 认证的暂停和撤销

如果认证产品被发现不符合 EPA 复合木制品认证的基本要求, 或出现 4.7.2 中描述的情况, 认证证书将被撤销。

在调查不符合项并得出结论之前, 认证机构可暂停认证, 通知证书持有人, 并相应更新记录。

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如果调查结果表明不符合项无法确认，或证书持有人已采取适当的补救措施，则应恢复被暂停证书的有效性，并相应更新记录。

如果调查表明不符合项可以确认，且证书持有人没有在规定时间内采取适当的补救措施，则应撤销被暂停的证书，并相应更新记录。

4.10 记录

每个EPA TSCA Title VI TPC必须以电子形式保存以下记录，保存时限为自记录创建之日起三年，并在EPA提出要求后的30个自然日内提供给EPA：

- 1) 经EPA TSCA Title VI TPC认证的面板生产商及其各自产品和产品类型的列表，包括所使用的树脂系统类型；
- 2) 针对每个面板生产商及其产品类型进行的检查和甲醛排放测试的结果；
- 3) EPA TSCA Title VI TPC使用的实验室列表以及所有测试方法，包括测试条件、调节时间及季度测试结果；
- 4) 用于建立测试方法相关性及等效性的方法和结果；
- 5) 关于无醛豁免认证（NAF）或超低甲醛豁免认证（ULEF）的第三方认证文件，或ULEF减少测试批准的记录，包括面板生产商的名称、工厂、批准的产品、使用的树脂系统类型及批准日期；
- 6) 关于中密度纤维板或刨花板生产商减免测试批准的文件，包括面板生产商的名称、批准的产品及批准日期；
- 7) 由其EPA TSCA Title VI认可机构（ABs）提供的最近一次评估、重新评估和/或监督现场评估报告副本。

4.11 标签的使用

经认证的复合木制品的标签的使用须符合770.45的要求，TR China的TPC号码为EPA TPC-100。

4.12 通报 EPA 770.7

4.12.1 向 EPA 的通知要求

每个EPA TSCA Title VI TPC必须根据770.8的规定，适当情况下向EPA提供以下通知：

- 1) 在批准或拒绝一项无醛豁免认证（NAF）或超低甲醛豁免认证（ULEF）的第三方认证申请，包括续期申请时，必须在批准或拒绝后的五个自然日内通知EPA，并在批准后30个自然日内将所有已批准的申请副本提交给EPA；
- 2) 在批准或拒绝中密度纤维板或刨花板的减免测试申请，包括续期申请时，必须在批准或拒绝后的五个自然日内通知EPA，并在批准后30个自然日内将所有已批准的申请副本提交给EPA；
- 3) 当面板生产商的连续三次质量控制测试（QCL）超出其既定的质量控制限值（QCL）时，TPC必须在其发现第三次超出的72小时内向EPA发出通知。通知内容应包括产品类型、超出QCL限制的质量控制测试日期、测试结果、根据ASTM E1333-14（参考文献见770.99）或ASTM D6007-14（参考文献见770.99）的方法关联等效值、既定的QCL值及所使用的质量控制方法；

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- 4) 每当季度测试失败（即任何样本超过 770.10 适用的甲醛排放标准）时，必须在 72 小时内向 EPA 发出通知。此通知中的信息不得作为机密商业信息处理；
- 5) 非国内 TPC（例如海外 TPC）在变更其服务代理时，必须在五个自然日内向 EPA 发出通知；
- 6) 如果 TPC 失去认证资格或决定停止参与 EPA TSCA Title VI 第三方认证方案，则必须在 72 小时内通知 EPA。

4.12.2 其他通知要求

每个 EPA TSCA Title VI TPC，在适用的情况下，还需提供以下通知：

- 1) 当季度测试失败（即任何样本超过 770.10 适用的甲醛排放标准）时，必须在 72 小时内以书面形式通知面板生产商。此通知中的信息不得作为机密商业信息处理；
- 2) 如果 TPC 失去认证资格或决定停止参与 EPA TSCA Title VI 第三方认证方案，则必须在 72 小时内通知所有其提供 EPA TSCA Title VI 认证服务的面板生产商；
- 3) TPC 如发生人员资质、程序或所使用实验室的变更，必须在 30 个自然日内通知其对应的 EPA TSCA Title VI 认可机构（ABs）。

4.13 年度报告

每个 EPA TSCA 第 VI 标题第三方认证机构（TPC）必须根据 770.8 的要求，于每年 3 月 1 日或之前提交上一日历年内所执行 TPC 服务的年度报告。季度测试结果、测试方法、测试日期和测试产品（包括产品名称或描述及面板生产商名称）不得作为机密商业信息处理。根据适用情况，报告内容必须包括以下所有要素：

- 1) 关于每个由 EPA TSCA 第 VI 标题第三方认证机构（TPC）认证的复合木制品生产商的信息，包括：
 - a) 在上一日历年内，该 TPC 认证的复合木制品；
 - b) 用于认证复合木制品的树脂系统类型；
 - c) 季度检查的日期；若根据本节(c)(4)(i)(G)段的要求进行远程检查，则 TPC 必须证明在检查时政府机构确认存在不安全条件；
 - d) 对于每次季度测试，需提供测试日期、测试结果、测试方法及是否使用了合同实验室；
 - e) 对于每次失败的季度测试，需提供产品类型、受影响产品的体积、再认证测试的结果以及受影响产品的最终处置描述，包括如何处理了不合格批次；
 - f) 对于由于质量控制测试失败导致的不合格批次，需提供测试日期、测试方法、产品类型、受影响产品的体积、批次号、重测结果及受影响产品的最终处置描述，包括如何处理了不合格批次；
 - g) 季度测试和检查所导致的任何纠正措施的描述。
- 2) TPC 使用的实验室和测试方法列表，以及大、小测试舱的数量和体积（立方米）、等效性确定的日期及等效性数据。
- 3) 由其 EPA TSCA Title VI 认可机构（ABs）发现的任何不符合项以及对这些不符合项的处理方式。
- 4) 除 CARB 实验室间对比测试外，在所有其他甲醛排放实验室间对比测试中的结果与实验室间对比测试平均值的比较结果，或者（若有）EPA 认可的能力验证计划的结果。

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4.14 其他

本作业指导书将[美国《联邦法规汇编》第 40 篇 770 部分《复合木制品甲醛释放限量标准》](#)部分内容纳入，更多内容请参见法规原文。

5. 岗位和职责

| Process Roles | Responsibilities |
|---------------|--|
| 申请评审员 | 评审认证服务的申请。必须具备 CH Mark 复核人员/认证决定人员的角色。申请评审仅可由复核人员或认证决定人员执行。 |
| 测试报告授权人 | 根据 ISO/IEC 17025 标准授权测试报告。 |
| 工厂检查员 | 由认证机构指定执行检查活动的人员，必须根据 MS-0045386 的要求具备相应的资格。 |
| 认证复核人员 | 有资格并被任命在特定领域工作的技术专家。认证机构为确保合格评定中有足够的技术能力而聘用的人员，在认证过程中被指派执行特定任务。 由认证机构指定根据 ISO/IEC 17065 最新有效版本（参见 MS-0049004）进行认证复核的人员。 |
| 认证决定人员 | 由认证机构指定的人员，根据 ISO/IEC 17065 最新有效版本（参见 MS-0049004）执行认证决定。 |

6. 规范

N/A

7. 附件

- Appendix 1 of MS-0038474 CARB EPA Certification Application.docx*
- Appendix 2 of MS-0038474 Scope Extension and Reduction Application.docx*
- Appendix 3 of MS-0038474 Application Review Checklist.docx*
- Appendix 4 of MS-0038474 Factory Inspection Report.docx*
- Appendix 5 of MS-0038474 Certification Checklist.docx*
- Appendix 6 of MS-0038474 Proof of Continous Compliance.docx*

8. 相关文件

- MS-0020192 - Global Product Certification Process*
- MS-0020192-Spec01 - Global Product Certification Process in BS Products*

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9. 外部参考文件

eCFR:: 40 CFR PART 770—FORMALDEHYDE STANDARDS FOR COMPOSITE WOOD PRODUCTS

**Certification Process of EPA TSCA Title VI Third-Party Certification Program
(EPA TSCA Title VI 第三方认证方案认证流程)**

Legal Scope:

TÜV Rheinland (China) Ltd.
TÜV Rheinland (Shenzhen) Co., Ltd.

Business Scope:

P.01 Softlines

Process Scope:

6.3 Service Delivery : 6.3.3 Certification

1. Objectives

This document describes the overall process through which TR China, as an EPA TSCA Title VI Third-Party Certifier (TPC), provides services related to the EPA TSCA Title VI third-party certification program in accordance with [eCFR :: 40 CFR Part 770 -- Formaldehyde Standards for Composite Wood Products](#) under the U.S. Toxic Substances Control Act (TSCA) Title VI. The process must comply with the following laws and regulations (including but not limited to):

- Regulations of the People's Republic of China on Certification and Accreditation
- Measures for the Administration of Certification Bodies
- Measures for the Administration of Certificates and Marks

This work instruction specifies the steps required for TR China to implement the EPA TSCA Title VI third-party certification scheme, which are further supplemented based on the definitions provided in the global certification process document MS-0020192.

2. Terms and Abbreviations

| Terms/Abbreviations | Description |
|------------------------------|---|
| EPA | U.S. Environmental Protection Agency |
| EPA TSCA Title VI TPC | EPA TSCA Title VI Third-Party Certifiers, means a conformity assessment body that provides both product certification services and laboratory testing services (either directly or through contracted services), is accredited by an EPA TSCA Title VI Product AB and an EPA TSCA Title VI Laboratory AB (unless the laboratory testing services are contracted to a laboratory accredited by an EPA TSCA Title VI Laboratory AB), and is recognized by EPA pursuant to 40 CFR PART 770.7(c). |
| TR China | EPA TSCA Title VI TPC, full name TÜV Rheinland (China) Ltd., TPC# is EPA-TPC-100. |
| Quality control limit or QCL | Means the value from the quality control method test that is the correlative equivalent to the applicable emission standard based on the ASTM E1333-14 or, upon showing equivalence in accordance with 40 CFR PART 770.20(d), the ASTM D6007-14. |

3. Scope of Application

**Certification Process of EPA TSCA Title VI Third-Party Certification Program
(EPA TSCA Title VI 第三方认证方案认证流程)**

This document applies to any composite wood products, and component parts or finished goods containing these materials, that are manufactured (including imported), distributed, and sold in the United States, including composite wood products used or installed in manufactured housing.

Classification Table of Composite Wood Products (Table 1) (Excerpted from CNAS-SC26):

| Broad category | Sub-category | Content |
|----------------------------|--------------|--------------------------------|
| 01 Composite wood products | 01.01 | Plywood |
| | 01.02 | Particleboard |
| | 01.03 | Medium-density fiberboard |
| | 01.04 | Thin medium-density fiberboard |
| 02 Veneer products | 02.01 | Veneer |

* Note:

1. Hardwood plywood, Particleboard, Medium-density fiberboard, Thin medium-density fiberboard, and veneer products are considered separate certification units.
2. Products of the same manufacturer and the same type but produced on different production lines shall be treated as separate certification units.
3. Products of the same manufacturer and the same type but produced on different production facilities shall be treated as separate certification units.

The EPA TSCA Title VI third-party certification scheme falls under the Type 5 scheme defined in ISO/IEC 17067. Its specific certification model is Type Testing + Initial Factory Inspection + Surveillance.

4. Activities

4.1 Application (200-300)

4.1.1 Receive customer inquiry (step 200)

Sales receives inquiries from applicants (e.g., manufacturers or authorized representatives) regarding product certification for composite wood products intended for export to the U.S. market or for manufacturing or sale in the United States.

Sales provide the client with all the necessary information for applying for certification, along with the corresponding application form.

The application materials must include at least the following information:

- 1) The type of certification the client intends to apply for: EPA Composite Wood Products Certification, EPA Composite Wood Products Certification - Formaldehyde Exemption Certification, or Low Formaldehyde Exemption Certification, etc.;
- 2) The name, address, phone number, and other contact details of the panel producer;
- 3) The name and contact information of the quality control supervisor at the panel producer;
- 4) An identification of the specific products for which certification is requested, and the resin system used in panel production;
- 5) Documents related to the panel producer's internal quality control system, such as the quality control manual, internal quality control records, etc.;
- 6) Formaldehyde emission test reports for the panels (if available).

4.1.2 Check inquiry (step 300)

The following information needs to be verified:

- 1) Verify that the client is not listed as a "seriously illegal and untrustworthy unit" in the [National Enterprise Credit Information Publicity System](#).

***Certification Process of EPA TSCA Title VI Third-Party Certification Program
(EPA TSCA Title VI 第三方认证方案认证流程)***

- 2) Initially verify whether the application materials submitted by the customer are complete and whether the panel producer has a proper understanding of the EPA Composite Wood Products Certification requirements and 40 CFR PART 770. All project-related information for providing certification services must be uploaded to the ComPASS document management system

4.2 Application Review (400-1000)

After the applicant submits its application for conformity assessment with the necessary information, data and document, the Certification body needs to ensure that:

- 1) provided information is sufficient.
- 2) determine the scope of certification regarding the product, standards, regulative and other normative rules.
- 3) the necessary competence and capability to perform all conformity assessment activities are available.

4.2.1 Determine scope of certification (step 400)

The personnel receiving the customer's application materials (e.g., engineers or technical experts) shall assess whether the wood products applying for certification are suitable for EPA certification. For wood products that do not fall within the scope of EPA certification, refer to 40 CFR Part 770.1(c). Relevant personnel should also verify the adequacy of the information provided in the application to clearly define the certification scope.

4.2.2 Standard Product (step 500)

Refer to Table 1 of this document for details.

4.2.3 Open new application review file (step 600)

For the performance of application review and preparation of quotation, a new project is opened in ComPASS, where the received certification application documentation is uploaded. The task will be sent to the Application Reviewer to check the submitted information.

4.2.4 Check of submitted information (step 700)

The application reviewer (Typically for reviewer or certifier) shall review the application materials submitted by the customer. The review should include the following:

- 1) Whether the product description is clear, including product name, model, thickness, and type of adhesive used;
- 2) Differences between the models within the product series;
- 3) The panel producer's quality control documents and records;
- 4) Formaldehyde emission test reports for the panels (if available);
- 5) Whether additional resources are required to conduct necessary testing;

4.2.5 Acceptance (step 800)

***Certification Process of EPA TSCA Title VI Third-Party Certification Program
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If the application review is approved, the certification application can be accepted.

If the application cannot be approved, the certification must be rejected, and the reasons must be communicated to the customer.

If the customer's application materials do not meet the requirements, the application process must be restarted, and the applicant must be informed to supplement and improve the materials.

4.2.6 Issue quotation & sign quote (step 900)

Submit detailed quotation to the client including all information and activities relevant for the certification. Such information related to the certification activities involved in the evaluation phase and potential subcontractors that may be utilized.

Designated sales staff shall provide the applicant with a quotation including all relevant information regarding the intended certification and used parties that are involved in the Evaluation phase.

Enter the relevant information in ComPASS.

Key Point: Certificate holders (including co-certificate holders) shall sign a general agreement with TÜV Rheinland (China). The template for the general agreement can be found on [TÜV Rheinland\(CN\) Homepage](#).

4.2.7 Open order (step 1000)

Designated staff shall open an order in ComPASS once quotation is signed back by the client and the client agreed to the quotation including all relevant information.

4.3 Evaluation (1100-1600)

The evaluation phase is always based on the evaluation plan. The evaluation plan is developed based on the certification scheme and the specific product requirements.

This evaluation plan shall include at least the following: the products to be certified, the standards, regulations, and other normative documents stipulating product requirements, as well as the methods and procedures used to evaluate the production process. The evaluation plan also includes a schedule for specific tasks. The corresponding evaluation tasks include activities such as design and document review, sampling, testing, inspection, and audits.

If there are any discrepancies between the evaluation plan and the contract signed with the client, a new application review and quotation should be initiated. If there are any changes to the parties involved in the evaluation process (compared to the contract), the applicant should be notified and their approval obtained before the evaluation begins.

Key Point: Only if the quotation explicitly includes the above-mentioned content can it be considered as the evaluation plan.

4.3.1 Testing, Inspection, Auditing (step 1100)

For quarterly testing, EPA TSCA Title VI TPC must use only laboratories accredited by an EPA TSCA Title VI Laboratory Accreditation Body (Laboratory AB), and these laboratories must participate in the CARB-organized formaldehyde emission inter-laboratory comparison program (if available) or an EPA-recognized proficiency testing or inter-laboratory comparison program (if available).

4.3.1.1 The general testing requirements shall comply with 770.20 a

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- 1) All panels must be tested prior to the application of a finishing or topcoat. Conditioning of panels for testing must start as soon as possible after panel production, but no later than 30 calendar days after the panels were produced.
- 2) Facilities that conduct the formaldehyde testing required by this section must follow the procedures and specifications, such as testing conditions and loading ratios, of the test method being used.
- 3) All equipment used in the formaldehyde testing required by this section must be calibrated and otherwise maintained and used in accordance with the equipment manufacturer's instructions.

4.3.1.2 Quarterly testing requirements shall comply with 770.20 c

Quarterly testing. Quarterly testing must be supervised by EPA TSCA Title VI TPCs and performed by TPC laboratories.

1) Allowable methods

Quarterly testing must be performed using ASTM E1333-14 (incorporated by reference, see § 770.99) or, with a showing of equivalence pursuant to paragraph (d) of this section, ASTM D6007-14 (incorporated by reference, see § 770.99).

2) Sample selection

- a) Samples must be randomly chosen by an EPA TSCA Title VI TPC.
- b) Samples must be selected from each certified product type for quarterly testing purposes. For hardwood plywood samples, the samples must be randomly selected from products that represent the range of formaldehyde emissions of products produced by the panel producer.
- c) Samples must not include the top or the bottom composite wood product of a bundle.
- d) Test results may represent a single chamber value or, if using the ASTM D6007-14 apparatus, the average value of testing nine specimens representing evenly distributed portions of an entire panel. The nine specimens must be tested in groups of three specimens, resulting in three data points, which must be averaged to represent one test value for the panel those specimens represent.

3) Sample handling

Samples must be closely stacked or air-tight wrapped between the time of sample selection and the start of test conditioning. Samples must be labeled as such, signed by the EPA TSCA Title VI TPC, bundled air-tight, wrapped in polyethylene, protected by cover sheets, and promptly shipped to the TPC laboratory. Conditioning must begin as soon as possible, but no later than 30 calendar days after the samples were produced.

4) Results

Any sample that exceeds the applicable formaldehyde emission standard in § 770.10 must be reported by the EPA TSCA Title VI TPC to the panel producer in writing and to EPA, in accordance with § 770.8, within 72 hours. The panel producer must comply with § 770.22 with respect to any lot represented by a sample result that exceeds the applicable formaldehyde emission standard. Where multiple products are grouped in a single product type for testing, this includes all products in the group represented by the sample.

5) Reduced testing frequency

Composite wood products that have been approved by an EPA TSCA Title VI TPC or CARB for reduced testing under § 770.18(c) need only undergo quarterly testing every six months.

4.3.1.3 The transportation and handling of samples shall comply with 770.24 a

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Composite wood products may be transported into or across the United States for quality control or quarterly testing. The transportation of composite wood panels solely for the purposes of quality control or quarterly testing to or across the U.S. by third-party certifiers (TPCs) shall not render them as importers, distributors, or importers under the scope of 770.7(c)(3)(i).

- 1) These panels must not be sold, offered for sale, or supplied to any entity other than the TPC laboratory before testing is conducted under 770.17, 770.18, or 770.20.
- 2) If the test results for such products conform to the emission standards under this subsection, the panels may be relabeled under 770.45 and sold, offered for sale, or supplied.

The test report must be stored in the ComPASS system.

4.3.2 Factory inspection (step 1200)

The initial and surveillance factory inspection each require 1 person-day..

The inspection content shall include:

4.3.2.1 Quality control manual, facilities, and personnel shall comply with 770.21

- 1) Quality control manual
 - a) Each panel manufacturer must have a written Quality Control Manual. The manufacturer's quality control manual shall include at least the following contents:
 - (i) A description of the organizational structure of the quality control department, including the names of the quality control manager and quality control employees;
 - (ii) A description of the sampling procedures to be followed;
 - (iii) A description of the method of handling samples, including a specific maximum time period for analyzing quality control samples;
 - (iv) A description of the frequency of quality control testing;
 - (v) A description of the procedures used to identify changes in formaldehyde emissions resulting from production changes (e.g., increase in the percentage of resin, increase in formaldehyde/ urea molar ratio in the resin, or decrease in press time);
 - (vi) A description of provisions for additional testing;
 - (vii) A description of recordkeeping procedures;
 - (viii) A description of labeling procedures;
 - (ix) The average percentage of resin and press time for each product type;
 - (x) A description of product types, and if applicable, a description of product variables covered under each product type;
 - (xi) Procedures for reduced quality control testing, if applicable;
 - (xii) Procedures for handling non-complying lots, including a description of how the panel producer will ensure compliance with the notification requirements of 40 CFR PART 770.22(d)(1).
 - b) The Quality Control Manual must be approved by the EPA TSCA Title VI Certification Body (TPC).

2) Quality control facilities

Each panel producer must designate a quality control facility for conducting quality control formaldehyde testing.

- a) The quality control facility must be an EPA TSCA Title VI TPC, a contract laboratory, or a laboratory owned and operated by the panel producer.

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- b) Each quality control facility must have quality control employees with adequate experience and/or training to conduct accurate chemical quantitative analytical tests. The quality control manager must identify each person conducting formaldehyde quality control testing to EPA TSCA Title VI certification body (TPC) .
- 3) Quality control manager

Each panel producer must designate a person as quality control manager with adequate experience and/or training to be responsible for formaldehyde emissions quality control.

The quality control manager must:

- a) Have the authority to take actions necessary to ensure that applicable formaldehyde emission standards are being met on an ongoing basis;
- b) Be identified to EPA TSCA Title VI TPC that will be overseeing the quality control testing. The panel producer must notify EPA TSCA Title VI TPC in writing within ten calendar days of any change in the identity of the quality control manager and provide EPA TSCA Title VI TPC with the new quality control manager's qualifications;
- c) Review and approve all reports of quality control testing conducted on the production of the panel producer;
- d) Ensure that the samples are collected, packaged, and shipped according to the procedures specified in the quality control manual;
- e) Inform EPA TSCA Title VI TPC in writing of any significant changes in production that could affect formaldehyde emissions within 72 hours of making those changes.

4.3.2.2 Quality control testing shall comply with 770.20 b

- 1) Allowable methods.

Quality control testing must be performed using any of the following methods, with a showing of correlation for each method pursuant to paragraph (d) of this section:

- a) ASTM D6007-14 (incorporated by reference, see § 770.99).
- b) ASTM D5582-14 (incorporated by reference, see § 770.99).
- c) BS EN ISO 12460-3:2020 (incorporated by reference, see § 770.99) or ISO 12460-3:2020(E) (incorporated by reference, see § 770.99).
- d) DMC 2007 User's Manual (incorporated by reference, see § 770.99).
- e) DMC 2012 GP User's Manual (incorporated by reference, see § 770.99).
- f) BS EN ISO 12460-5:2015 E (Perforator Method) (incorporated by reference, see § 770.99).
- g) JIS A 1460:2021(E) (24-hr Desiccator Method) (incorporated by reference, see § 770.99).

- 2) Frequency of testing

- a) Particleboard and medium-density fiberboard must be tested at least once per shift (eight or twelve hours, plus or minus one hour of production) for each production line for each product type. Quality control tests must also be conducted whenever:
 - (i) A product type production ends, even if eight hours of production has not been reached;
 - (ii) The resin formulation is changed so that the formaldehyde to urea ratio is increased;
 - (iii) There is an increase by more than ten percent in the amount of formaldehyde resin used, by square foot or by panel;
 - (iv) There is a decrease in the designated press time by more than 20%; or
 - (v) The quality control manager or quality control employee has reason to believe that the panel being produced may not meet the requirements of the applicable standards.
- b) Particleboard and medium-density fiberboard panel producers are eligible for reduced quality control testing if they demonstrate consistent operations and low variability of test values.

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- (i) To qualify, panel producers must:
 - (A) Apply in writing to an EPA TSCA Title VI TPC; and
 - (B) Maintain a 30 panel running average.
- (ii) With respect to reduced quality control testing, EPA TSCA Title VI TPCs:
 - (A) May approve a reduction to one quality control test per 24-hour production period if the 30 panel running average remains two standard deviations below the designated QCL for the previous 60 consecutive calendar days or more;
 - (B) May approve a reduction to one quality control test per 48-hour production period if the 30 panel running average remains three standard deviations below the designated QCL for the previous 60 consecutive calendar days or more;
 - (C) Will approve a request for reduced quality control testing as long as the data submitted by the panel producer demonstrate compliance with the criteria and the EPA TSCA Title VI TPC does not otherwise have reason to believe that the data are inaccurate or the panel producer's production processes are inadequate to ensure continued compliance with the emission standards; and
 - (D) Will revoke approval for reduced quality control testing if testing or inspections indicate a panel producer no longer demonstrates consistent operations and low variability of test values.
- c) Plywood must be tested as follows:
 - (i) At least one test per week per product type if the weekly plywood production at the panel producer is more than 100,000 but less than 200,000 square feet.
 - (ii) At least two tests per week per product type if the weekly plywood production at the panel producer is 200,000 square feet or more, but less than 400,000 square feet.
 - (iii) At least four tests per week per product type if the weekly plywood production at the panel producer is 400,000 square feet or more.
 - (iv) If weekly production of plywood at the panel producer is 100,000 square feet or less, at least one test per 100,000 square feet for each product type produced; or, if less than 100,000 square feet of a particular product type is produced, one quality control test of that product type every month that it is produced.
 - (v) Quality control tests must also be conducted whenever:
 - (A) The resin formulation is changed so that the formaldehyde to urea ratio is increased;
 - (B) There is an increase by more than ten percent in the amount of formaldehyde resin used, by square foot or by panel;
 - (C) There is an increase by more than 20% in the adhesive application rate;
 - (D) There is a decrease in the designated press time by more than 20%; or
 - (E) The quality control manager or quality control employee has reason to believe that the panel being produced may not meet the requirements of the applicable standard.
- d) Composite wood products that have been approved by an EPA TSCA Title VI TPC or CARB for reduced testing under § 770.18(b) through (c) must be tested at least once per week per product type and, for particle board and medium-density fiberboard, per production line, for products produced that week, except that hardwood plywood panel producers who qualify for less frequent testing under paragraph (b)(2)(iii)(D) of this section may continue to perform quality control testing under that provision.

(3) Test results

Any test result that exceeds the QCL established pursuant to § 770.7(c)(4)(i)(C) must be reported to the EPA TSCA Title VI TPC in writing within 72 hours. The panel producer must comply with § 770.22 with respect to any lot represented by a quality control sample that exceeds the QCL. Where multiple products are grouped in a single product type for testing, this includes all products in the group represented by the sample.

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4.3.3 Non-conformities? (step 1300)

It must be determined if the tested product complies with the requirements or if there are any non-conformities. When deviations are identified during the product test and/or the factory inspection, the manufacturer shall receive a detailed deviation report and must correct the deviations until the deadline.

4.3.4 Substantiated Non-conformities? (step 1400)

When nonconformities with certification requirements are confirmed through surveillance or other means, the certification body shall consider and decide on appropriate actions. According to ISO/IEC 17065:2012/Clause 7.11.1, appropriate actions may include the following:

- 1) Continuing certification under specified conditions set by the certification body (e.g., increasing the frequency of surveillance);
- 2) Reducing the scope of certification to remove nonconforming product variants;
- 3) Suspending certification, pending remedial action by the client;
- 4) Withdrawing certification.

4.3.5 Submit result on nonconformities to the client (step 1500)

Nonconformities are communicated to the client, who needs to express interest in continuing the certification process. If the client expresses interest in the continuation of the certification process, an evaluation report is provided with additional evaluation tasks, necessary for the verification of the corrective actions. Prior submission of the new evaluation plan has to be verified if step 900 (Issue quotation & sign quote) has to be conducted.

4.3.6 Verify the corrective action plan (step 1600)

It shall be verified that the client has applied the corrective actions and measures according to its corrective action plan within the specified time limits, to resolve all non-conformities. A newly modified sample with a description of how the non-conformities have been addressed can be considered as a corrective action plan. The verification might trigger the need to conduct step 1100 (Evaluation) and/or step 1200 (Factory Inspection). Depending on the corrections needed, the evaluation must be performed completely or for those parts which caused the deviation report. The client will be informed about the verification accordingly.

4.4 Review and certification decision (1700-1900)**4.4.1 Determine conformity evidence (step 1700)****4.4.1.1 Applications for EPA Composite Wood Products Certification must comply with the formaldehyde emission limits required in 770.10 b.**

- 1) For plywood made with a veneer core or a composite core, 0.05 parts per million (ppm) of formaldehyde.
- 2) For medium-density fiberboard, 0.11 ppm of formaldehyde.
- 3) For thin medium-density fiberboard, 0.13 ppm of formaldehyde.
- 4) For particleboard, 0.09 ppm of formaldehyde.

4.4.1.2 Applications for no-added formaldehyde exemption certification must comply with the formaldehyde emission limits required in 770.17(c) and the requirements in 770.17 a:

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- 1) No test result higher than 0.05 parts per million (ppm) of formaldehyde for hardwood plywood and 0.06 ppm for particleboard, medium-density fiberboard, and thin medium-density fiberboard.
- 2) In the three months of regular quality control testing data, 90% of the data, as well as the test results obtained through Level 1 or Level 2 testing methods (refer to 40 CFR PART 770.17(a)), must be shown to be no higher than 0.04 ppm.

Producers of composite wood product panels made with no-added formaldehyde-based resins may apply to an EPA TSCA Title VI TPC or to CARB for a two-year exemption from the testing requirements in § 770.20 and certification requirements in §§ 770.15 and 770.40(b). The application must contain the following:

- 1) The panel producer's name, address, and telephone number;
- 2) An identification of the specific product and the resin system;
- 3) At least one test conducted under the supervision of an EPA TSCA Title VI TPC pursuant to test method ASTM E1333-14 or ASTM D6007-14 (incorporated by reference, see § 770.99). Test results obtained by ASTM D6007-14 must include a showing of equivalence in accordance with § 770.20(d)(1); and
- 4) Three months of routine quality control tests under § 770.20, including a showing of correlation in accordance with § 770.20(d)(2), totaling not less than thirteen quality control tests.

4.4.1.3 Applications for ultra-low formaldehyde exemption certification must comply with the formaldehyde emission limits required in 770.18 c or 770.18 d, as well as the requirements in 770.18 a:

- 1) No test result higher than 0.05 parts per million (ppm) of formaldehyde for hardwood plywood, 0.08 ppm for particleboard, 0.09 ppm for medium-density fiberboard, and 0.11 ppm for thin medium-density fiberboard.
- 2) For 90% of the six months of routine quality control testing data required under paragraph (a)(4) of this section, no higher than 0.05 ppm of formaldehyde for particleboard, no higher than 0.06 ppm of formaldehyde for medium-density fiberboard, and no higher than 0.08 ppm of formaldehyde for thin medium-density fiberboard.

Or:

No test result is higher than 0.05 ppm of formaldehyde for hardwood plywood or 0.06 ppm of formaldehyde for particleboard, medium-density fiberboard, and thin medium-density fiberboard:

- 1) Ninety percent of six months of routine quality control testing data and the results of two quarterly primary or secondary method tests (required under paragraphs (a)(3) and (4) of this section) must be shown to be no higher than an ultra-low-emitting formaldehyde resins (ULEF)-target value of 0.04 ppm.
- 2) Producers of composite wood product panels made with ultra low-emitting formaldehyde resins may apply to an EPA TSCA Title VI TPC or CARB for approval, either to:
 - a) conduct less frequent testing than is specified in § 770.20 or
 - b) approval for a two-year exemption from the testing requirements in § 770.20 and certification requirements in §§ 770.15 and 770.40(b).

The application must contain the following:

- 1) The panel producer's 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 E1333-14 or ASTM D6007-14 (incorporated by reference, see § 770.99). Test results obtained by ASTM D6007-14 must include a showing of equivalence in accordance with § 770.20(d)(1); and
- 4) Six months of routine quality control tests under § 770.20, including a showing of correlation in accordance with § 770.20(d)(2), totaling not less than twenty-six quality control tests.

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- 5) The certification body shall designate at least one person to review all information and results related to the evaluation. The review shall be conducted by an impartial person who was not involved in the evaluation process.

4.4.2 Certification recommended? (step 1800)

After reviewing all information, documents, and results related to the evaluation, the reviewer shall decide whether to recommend certification. If the product and evaluation documents meet the requirements, the reviewer shall recommend certification. If they do not meet the following requirements, a recommendation to deny certification may trigger Step 1300 (Nonconformity) or initiate new or additional evaluation under Step 1100 and/or 1200.

4.4.3 Recommend certification (step 1900)

Recommendations for a certification decision based on the review shall be documented in the applicable certification scheme review checklist. The certification recommendation will be entered into ComPASS.

4.5 Certification decision (2000-2200)**4.5.1 Decide on Certification (step 2000)**

Once the reviewer has uploaded and published the documentation and certification recommendation in ComPASS and SAP CORE, a task will be assigned in ComPASS to the certifier. If the certification is granted by the certifier, he/she will switch the status in SAP CORE to Status 14.

If necessary, he/she may request the reviewer to verify the technical accuracy of the certificate content.

Finally, the certifier must ensure that all requirements of the certification scheme have been met. All relevant information in SAP CORE will subsequently be transferred to CERTIPEDIA.

Attachment 2 of MS-0043417, the certification checklist, serves as a detailed plan and guide for making and documenting certification decisions. The certification decision will be recorded in ComPASS, and any additional relevant documents, particularly the completed certification checklist, must be uploaded.

Key Point: The certifier who is taking the certification decision must not have been engaged in the evaluation. However, the review and the certification decision might be completed concurrently by the same person or group of persons.

4.5.2 Certification granted? (step 2100)

In case Certification has been granted then proceed with next step, step 2200 (Issuance of Certificates and Required Information). On the opposite, when Certification cannot be granted, depending on what caused the rejection either applicant/certificate holder has to be informed with a negative report or step 1100 (Evaluation) respectively step 1200 (Factory Inspection) has to be repeated if non-conforming work occurred. Depending on applicant's/certificate holder's answer following options shall be applied:

- Option 1: If applicant/certificate holder decides on continuing the certification, process goes back to step 1100;
- Option 2: If applicant/certificate holder decides on not continuing the certification process, close project & issue invoice.

4.5.3 Issuance of Certificates and Required Information (step 2200) If the certification is approved, an EPA Composite Wood Product Certification Certificate shall be issued to the certification applicant.

The certification certificate shall include the following information:

- name and address of the certification body;

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- name and address of the certificate holder;
- name and address of the production facility;
- certificate number;
- date of issue and validity period of the certificate (the validity period is 1 year);
- product name;
- technical information of the product, including specifications, models, and thickness;
- basis for certification;
- certification model;
- the EPA TPC number;
- name of the certifier.

Key Point: *If the certification body has received accreditation from an EPA-recognized accreditation body, the certificate shall include the accreditation mark.*

If the certification applicant wishes the certificate not to bear the accreditation mark, the applicant must provide an explanation to both the certification body and the accreditation body.

If both the certification body and the accreditation body find the applicant's explanation reasonable and acceptable, an exception may be made.

4.6 Surveillance (step 2300-2900)

4.6.1 Testing, Inspection, Auditing (step 2300)

Supervision activities include product sampling and testing, as well as factory inspections, conducted quarterly.

1) Quarterly Testing

TR China assigns designated laboratories to conduct quarterly testing of sampled products using ASTM E1333-14 or ASTM D6007-14 standards. The test results are compared with the panel manufacturer's quality control testing results to verify the accuracy of the manufacturer's formaldehyde quality control tests. The equivalence and correlation of the testing methods are evaluated according to the requirements of 40 CFR PART 770.20. The sampling and testing requirements for quarterly testing are the same as those outlined in Section 4.3.1 of this certification scheme.

Note: For quarterly testing, TR China may only use laboratories accredited by an EPA-recognized accreditation body. Additionally, the accuracy of the formaldehyde emission tests performed by the laboratory for EPA composite wood product certification requirements must be verified.

2) Quarterly Factory Inspection

TR China sends qualified inspectors to conduct quarterly factory inspections of the manufacturer, its products, and related records. The inspection shall focus on whether the manufacturer continues to comply with the relevant requirements of 40 CFR PART 770.20, 770.21, 770.22, 770.24, 770.40, and 770.45.

4.6.2 Non-conformities? (step 2400)

Determine whether there are any nonconformities in the quarterly testing results and supervisory inspections. If there are no non-conformities then it could be continued with step 2900.

4.6.3 Substantiated Non-conformities? (step 2500)

When a non-conformity with certification requirements is substantiated, either as a result of surveillance or otherwise, the certification body shall consider and decide upon the appropriate action. According to ISO/IEC 17065:2012 / clause 7.11.1, an appropriate action can include the following:

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- 1) Continuation of certification under conditions specified by the certification body (e.g. increase surveillance);
- 2) Reduction in the scope of the certification to remove nonconforming product variants;
- 3) Suspension of the certification pending remedial action by the client;
- 4) Withdrawal of the certification.

4.6.4 Submit result on nonconformities to the client (step 2600)

Nonconformities together with the time for the corrective actions are communicated to the client. If the client expresses interest in the continuation of the certification process, he provides a corrective action plan linked to the given timeframe.

4.6.5 Verify the corrective action plan (step 2700)

It must be verified that the client has applied the corrective actions and measures according to his corrective action plan within the given timeframes, to resolve the nonconformities. The client receives a corresponding surveillance report.

4.6.6 Ok (Corrective actions accepted)? (step 2800)

In case the elaborated corrective action plan send back by customer fulfills all certification requirements, certification will be maintained. In any case of not met certification requirements, the process goes back into the Evaluation phase (step 1100).

4.6.7 Maintain Certification (step 2900)

If the supervision results meet the requirements, the validity of the certification certificate can be maintained, and a Continuing Supervision Certificate can be issued.

The EPA Composite Wood Product Certification Certificate is valid for one year.

At the end of the specified validity period, the certificate will automatically expire. In such cases, the client does not need to be separately notified.

If the client wishes to renew the certification, they can usually start submitting the application two months before the expiration date.

4.6.7.1 For No-added formaldehyde-based resins exemption shall comply with 770.17 e:

After the two-year period of the initial exemption, and every two years thereafter, in order to continue to qualify for the exemption from the testing and certification requirements, the panel producer must reapply to an EPA TSCA Title VI TPC or to CARB and obtain at least one test result in accordance with paragraph (a)(3) of this section that complies with the emission standards in paragraph (c)(1) of this section.

4.6.7.2 For Ultra low-emitting formaldehyde resins exemption shall comply with 770.18 g:

After the two-year period of the initial exemption, and every two years thereafter, in order to continue to qualify for the exemption from the testing and certification requirements, the panel producer must reapply to an EPA TSCA Title VI TPC or CARB and obtain at least two test results in accordance with paragraph (a)(3) of this section that comply with the emission standards in paragraph (d)(1) of this section.

4.7 Changes affecting the certification

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As general process any approval of changes will be confirmed by issuing a revision of the original certificate as an additional "sheet" to the existing license no. (i.e. in SAP CORE numbering CP xxxxxxxx 0002, CP xxxxxxxx 0003...) which shall contain the full and updated information of previous certificate sheet. The validity date of the new certificate " sheet " remains consistent with the original certificate.

4.7.1 Changes to the certified product

The panel producer shall inform TR China of any modifications to the approved type that may affect the conformity of the product with the essential requirements of corresponding standards in force or the conditions for validity of the certificate, particularly the case of a change to the manufacturing process, the raw materials or components of the certified product.

Such modifications require additional approval by TR China and the certificate holder shall describe all changes in detail and submit supporting documentation as required.

The difference between the modified product and the originally certified product shall be re-evaluated and the process follows the same steps as a new application, taking all existing conformity assessment results into due account.

4.7.2 Changes to the certification requirements

TR China as an EPA TSCA Title VI TPC shall keep itself and its clients apprised of any changes in product standards, laws and regulations, and the generally acknowledged state of the art.

Clients shall be informed about such changes directly or via the TUV Rheinland office.

Upon application by the client, during application review it is determined that further evaluation (inspection of samples, testing, document review, etc.) is required, TR China shall inform the client accordingly.

The originally certified product is re-evaluated, and the process follows the same steps as a new application, taking all existing conformity assessment results into due account.

If the client does not apply to re-evaluate the products the certification may be cancelled once the transition period defined by TR China has been expired, and records shall be updated accordingly.

4.8 Extending or reducing the scope of a certification

The "certification scope" may refer to the product name, product model/type, panel thickness, panel manufacturer, etc.

Approval of changes to the certification scope will be confirmed in accordance with Section 4.7.

4.8.1 Reducing scope of certification

If applicant applies to reduce the scope of certification (e.g. cancellation of models), the difference between the reduced and original scope for the certified product is re-evaluated and the process follows the same steps as a new application, taking all existing conformity assessment results into due account.

4.8.2 Extending scope of certification

If applicant applies to extend the scope of certification (e.g. addition of models, addition of production addresses), the difference between the extended and original scope for the certified product is re-evaluated and the process follows the same steps as a new application, taking all existing conformity assessment results into due account.

4.9 Termination, Suspension and Withdrawal of certification

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After coordinating with the relevant business areas, the certification body, labeling supervision team, or commercial order processing team may decide to terminate, suspend, or revoke the EPA Composite Wood Products Certification based on the following reasons:

- The client or its manufacturing facility is listed in the "List of Enterprises with Serious Violations and Dishonesty" in the [National Enterprise Credit Information Publicity System](#);
- Changes in testing requirements;
- Nonconformities identified during testing or failure to report relevant changes to the product or quality management system;
- Nonconformities discovered during follow-up inspections, sample testing, or audits;
- Refusal to grant access to production sites, storage facilities, or areas to be audited;
- Misuse of certification, such as misrepresenting certification content or misleading use of certificates and test marks;
- Refusal to provide access to relevant records;
- Failure to pay relevant fees;
- Failure to fulfill the obligation to report events required by the certification body.

If action is necessary for any of the above reasons, the labeling supervision team, commercial order processing team, or certification body will initiate the relevant issue handling process according to the division of responsibilities, usually involving the relevant certifier. Efforts should be made to clarify the situation within a reasonable timeframe.

If the issue cannot be resolved and the problems persist, resulting in the necessary termination, suspension, or revocation of the EPA Composite Wood Products Certification, the certification body, labeling supervision team, or commercial order processing team will proceed with the termination, suspension, or revocation of the certificate. The relevant cancellation or revocation procedures will be initiated in the CORE system.

If necessary, the relevant authorities or other certification bodies will also be notified.

4.9.1 Termination of certification

Upon the client's request, the EPA Composite Wood Product Certification can be terminated before its expiration date. The certificate holder shall submit a written termination request to TR China.

Note: The license holder is not entitled to receive a refund for any registration fees already paid for the certification of product.

4.9.2 Suspension and Withdrawal of certification

If the certified product is found to be non-compliant with the basic requirements of the EPA Composite Wood Product Certification, or if the situations described in Section 4.7.2 occur, the certification certificate will be revoked.

While investigating the non-conformity findings and until reaching a conclusion the CAB may suspend a certification, inform the certificate holder, and records shall be updated accordingly.

Should the investigation demonstrate that the non-conformities could not be confirmed or if the holder of the certificate has taken appropriate remedial actions, the validity of the suspended certificate may be reinstated, and records shall be updated accordingly.

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Should the investigation demonstrate that the non-conformities could be confirmed, and the holder of the certificate did not take appropriate remedial actions within the provided timeframe, the suspended certificate shall be withdrawn, and records shall be updated accordingly.

4.10 Record

Each EPA TSCA Title VI TPC must maintain the following records in electronic form, with a retention period of three years from the date of record creation and provide it to the EPA within 30 calendar days upon EPA's request:

- 1) A list of certified panel manufacturers and their certified products and product types, including the type of resin used.
- 2) Results of inspections and formaldehyde emission tests conducted for each panel manufacturer and product type.
- 3) A list of laboratories used by EPA TSCA Title VI TPC, along with their testing methods, including test conditions, pre-equilibration time, and quarterly test results.
- 4) Methods and results used to determine the correlation and equivalence of test methods.
- 5) Third-party certification documents related to no-added formaldehyde (NAF) or ultra-low emitting formaldehyde (ULEF) exemption or ULEF reduced testing, including the panel manufacturer's name, facilities, approved products, type of adhesive used, and the date of approval.
- 6) Approval documents for reduced testing for medium-density fiberboard (MDF) or particleboard manufacturers, including the name of the panel manufacturer, approved products, and the date of approval.
- 7) A copy of the most recent assessment, reassessment, and/or surveillance on-site assessment report provided by its EPA TSCA Title VI Accreditation Bodies (ABs).

4.11 Use of Labels

The use of labels for certified composite wood products must comply with the requirements of §770.45, and the TPC number for TR China is EPA TPC-100.

4.12 Notifications to EPA 770.7.**4.12.1 The requirements for reporting to EPA**

Each EPA TSCA Title VI TPC must provide, in accordance with § 770.8, the following notifications to EPA, as applicable:

- 1) Notification of an approved or rejected application, including a renewal application, for a NAF or ULEF third-party certification exemption or ULEF reduced testing within five calendar days of approval or rejection with copies of all approved applications forwarded to EPA within 30 calendar days of approval.
- 2) Notification of an approved or rejected application, including a renewal application, for reduced testing for medium-density fiberboard or particleboard within five calendar days of approval or rejection with copies of all approved applications forwarded to EPA within 30 calendar days of approval.
- 3) Notification of a panel producer exceeding its established QCL for three consecutive quality control tests within 72 hours of the time that the TPC becomes aware of the third consecutive exceedance. The notice must include the product type, dates of the quality control tests that exceeded the QCL, quality control test results, ASTM E1333-14 (incorporated by reference, see § 770.99) or ASTM D6007-14 method (incorporated by reference, see § 770.99) correlative equivalent values in accordance with § 770.20(d), the established QCL value(s) and the quality control method used.

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- 4) Notification of each failed quarterly test, that is any sample that exceeds the applicable formaldehyde emission standard in § 770.10, must be sent to EPA within 72 hours. The information in this notification is not eligible for treatment as confidential business information.
- 5) Notification of a change in a non-domestic TPC's agent for service within five calendar days.
- 6) Notification of a loss of accreditation or notification that the TPC has discontinued its participation in the EPA TSCA Title VI Third-Party Certification Program must be provided to EPA within 72 hours.

4.12.2 Other notifications

Each EPA TSCA Title VI TPC must provide the following notifications, if applicable:

- 1) Notification of each failed quarterly test, that is any sample that exceeds the applicable formaldehyde emission standard in § 770.10, to the panel producer in writing within 72 hours. Information in this notification is not eligible for treatment as confidential business information.
- 2) Notification of a loss of accreditation or notification that the TPC has discontinued its participation in the EPA TSCA Title VI Third-Party Certification Program within 72 hours to all panel producers for which it provides EPA TSCA Title VI certification services.
- 3) Notification of any changes in personnel qualifications, procedures, or laboratories used, to the TPC's EPA TSCA Title VI ABs within 30 calendar days.

4.13 Annual report

Each EPA TSCA Title VI TPC must provide, in accordance with § 770.8, an annual report on or before March 1st of each year for the TPC services performed during the previous calendar year. Quarterly test results, the test method, date of test, and product tested (including the product name or description and panel producer name) are not eligible for treatment as confidential business information. The report must contain all the following elements, as applicable:

- 1) The following information for each panel producer making composite wood products certified by the EPA TSCA Title VI TPC:
 - a) Composite wood products that the EPA TSCA Title VI TPC has certified during the previous calendar year;
 - b) Types of resin systems used for the composite wood products certified;
 - c) Dates of quarterly inspections; for any inspection(s) conducted remotely in accordance with paragraph (c)(4)(i)(G) of this section, the TPC must certify that a government entity identified the existence of unsafe conditions at the time of the inspection(s);
 - d) For each quarterly test, the date, result, test method, and whether a contract laboratory was used;
 - e) For each failed quarterly test, the product type, the volume of product affected, the results of recertification testing, and a description of the final disposition of the affected product, including how the non-complying lot was addressed;
 - f) For each non-complying lot resulting from a failed quality control test, the test date, method, product type, volume of product affected, lot numbers, the results of retesting, and a description of the final disposition of the affected product, including how the non-complying lot was addressed; and
 - g) Any corrective actions that resulted from quarterly tests and inspections.
- 2) A list of laboratories and test methods used by the TPC, number and volume (cubic meters) of large and small chambers, date of equivalence determination and equivalence data.
- 3) Any non-conformities identified by its EPA TSCA Title VI AB(s) and how they were addressed.

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- 4) The results compared with the meaning of the interlaboratory comparison for all formaldehyde emissions interlaboratory comparison tests other than the CARB interlaboratory comparison or, if available, the results of an EPA-recognized proficiency testing program.

4.14 Others

This work instruction incorporates certain provisions of [eCFR :: 40 CFR Part 770 -- Formaldehyde Standards for Composite Wood Products](#). For further details, please refer to the original text of the regulation.

5. Roles & Responsibilities

| Process Roles | Responsibilities |
|------------------------|--|
| Application Reviewer | Review the certification service application. Must have the role of CH Mark Reviewer/Certifier. Application review can only be performed by Reviewer or Certifier. |
| Test Report Authorizer | Authorize test report based on ISO/IEC 17025. |
| Factory Inspector | Personnel appointed by the certification body to carry out inspection activities must be qualified according to MS-0045386. |
| Reviewer | A technical expert who is qualified and appointed to work in a specific area. Personnel get involved by certifiers to ensure adequate technical competence in a conformity assessment and is assigned for specific tasks within the certification process. Personnel appointed by the certification body to carry out the review according to ISO/IEC 17065 in its latest valid version (see MS-0049004). |
| Certifier | Personnel designated by the certification body to carry out certification decisions according to ISO/IEC 17065 in its latest valid version (see MS-0049004). |

6. Specifications

N/A

7. Attachments

- Appendix 1 of MS-0038474 CARB EPA Certification Application.docx*
- Appendix 2 of MS-0038474 Scope Extension and Reduction Application.docx*
- Appendix 3 of MS-0038474 Application Review Checklist.docx*
- Appendix 4 of MS-0038474 Factory Inspection Report.docx*
- Appendix 5 of MS-0038474 Certification Checklist.docx*
- Appendix 6 of MS-0038474 Proof of Continuous Compliance.docx*

8. Related Documents

- MS-0020192 - Global Product Certification Process*
- MS-0020192-Spec01 - Global Product Certification Process in BS Products*

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9. External Reference Documents

eCFR:: 40 CFR PART 770—FORMALDEHYDE STANDARDS FOR COMPOSITE WOOD PRODUCTS