

EPA HCHO Emission Standards for Composite Wood Products

DOCUMENT RETENTION AND LABELING COMPLIANCE CHECKLIST FOR FABRICATORS (OTHER THAN LAMINATED PRODUCT PRODUCERS):

- Take reasonable precautions to ensure that composite wood products, component parts, and finished goods comply with HCHO emission standards.*
- Obtain and maintain for 3 years from the date of shipment, purchase, or import:
 - Bills of lading;
 - Invoices; and
 - Documents from suppliers including a **written statement** that the composite wood products, component parts, or finished goods are compliant or were produced prior to December 12, 2017.
- Employ method (e.g., color-coded edge) to identify supplier and link to label information for panels that are not individually labeled.
- Label finished goods (and component parts sold directly to consumers) with producer's name, date of production; and statement of TSCA Title VI compliance, in legible, English text.
- Do not label finished goods that are made **entirely** of composite wood products manufactured before the manufactured by date as TSCA Title VI compliant.
- [Optional] Do not label finished goods (and component parts sold directly to consumers) that contain less than 144 square inches of regulated wood (based on surface area of largest face), unless they are designed to be used in combination to create larger finished goods or component parts.
- [Optional] Label finished goods made from panels manufactured in accordance with § 770.17 and/or § 770.18 as made with no-added formaldehyde-based resins and/or ultra low-emitting formaldehyde resins (in addition to other labeling requirements).

Beginning
December 12, 2017

**Non-exempt laminated products must comply with emission standards by December 12, 2023*

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DISCLAIMER: This checklist is for informational purposes only and does not constitute legal advice.

