

Testing | Monitoring | Certification

# TSCA Title VI Certification

The Environmental Protection Agency (EPA), an independent agency of the United States for environmental protection has released a formaldehyde emission standard for wood materials. The EPA TSCA Title VI Regulation came into force on 1 June 2018.

The aim of the agency is to reduce the emissions of formaldehyde in wood materials.

## TSCA Title VI

The “Title VI – Toxic Substances Controll Act (TSCA)” describes the requirements for uncoated wood materials. TSCA Title VI is applicable to hardwood plywood, MDF, particle board and finished goods made of these products. The requirements relate to the described products which are sold, delivered, imported, provided or even manufactured in the United States of America.

## TSCA Certification

The implementation and compliance with the TSCA Title VI requirements must be carried out by an accredited certification body, such as the Fraunhofer WKI.

## (First) Certification – Main Requirements

- I. Quality Management Manual  
§ 770.21 (a)
- II. Product correlation – QCL  
§ 770.7 (4)(i)(c)
- III. Equipment correlation  
§ 770.20 (d); § 770.20 (2)
- IV. Procedure for Non-compliant Products  
§ 770.22 (d)(1)

## Quality Management Manual – § 770.21 (a)

- Organizational structure / organization
- Description of the sampling method
- Description of the measures to identify changes during the production process that affect the formaldehyde emission.

## Contact

[qa-info@wki.fraunhofer.de](mailto:qa-info@wki.fraunhofer.de)

Fraunhofer WKI  
Riedenkamp 3  
38108 Braunschweig  
Germany

[www.wki.fraunhofer.de](http://www.wki.fraunhofer.de)

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10/2023

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- Type and scope of self-monitoring.
- The method to detect changes in the formaldehyde emission in case of changes in the production process (e.g. a higher proportion of glue, increase in the ratio of formaldehyde/urea, etc.)
- Handling of the non-complying lots including the handling procedure of NCL's that had already been brought onto the market by the time the limit exceedance was detected (e.g. via a quarterly testing).

The Quality Management Manual must be reviewed and approved by a certification body.

### **Product correlation – QCL Determination § 770.7 (4)(i)(c)**

If the factory production control is not performed with the use of an ASTM chamber (must be equivalent to the ASTM E 1333), a (QCL) Quality Control Limit must be established for each TSCA Title VI certified product in cooperation with the certification body. The QCL is, unlike CARB, an absolute value that must not be exceeded.

The QCL is used by the manufacturer as well as by the inspector to supervise the products by means of the in-house production control.

### **Equipment Correlation § 770.20(d)(2)**

According to § 770.20 (d) (2), a correlation must be established between each used test method of the factory production control and an ASTM chamber.

### **Quarterly Supervision**

In order to maintain the certification both the quarterly supervision and the sampling of each TSCA VI product must be performed by the inspector.

### **Quarterly testing**

After a manufacturing facility has passed the qualification test requirement, quarterly checks are required to verify that the limit value requirements have been confirmed by an accredited testing laboratory in accordance with the standard. The samples are tested at the Fraunhofer WKI in a TSCA VI approved ASTM chamber.