

# ATTESTATION OF CONFORMITY

## EPA TSCA Title VI – Attestation ULEF – 2018-10-26-01

Expiry date: 26 October 2020

By order of the US Environmental Protection Agency (EPA), according to the Toxic Substances Control Act Title VI, under section 40 CFR Part 770 - Formaldehyde Emission Standards for Composite Wood Products, relating to EPA approval of third party certifiers under Subpart B - EPA TSCA Title VI, §770.7

**Entwicklungs- und Prüflabor Holztechnologie GmbH (EPH)**  
Zellescher Weg 24, D-01217 Dresden, Germany

as EPA TSCA Title VI recognized **TPC-10**

has assessed, that the below mentioned product fulfils the requirements according to EPA TSCA Title VI, §770.18(d) for a two-year exemption from testing requirements in §770.20 and certification requirements in §§ 770.15 and 770.40(b) for composite wood products as for the product a valid exemption from CARB is available, which is also valid under TSCA Title VI according to §770.18(e).

**Plywood (HWPW-VC), phenol-formaldehyde (PF), unfaced  
in the nominal thickness range of 4 mm - ≤ 50 mm**

manufactured by  
**Latvijas Finieris, plant Lignums**

at its manufacturing site  
**Finiera iela 6  
LV-1016 Riga, Latvia**

A supervision contract with no. BFU-08-10-13-01 /2117009 between EPH and the manufacturer is available. The attestation confirms the validity of CARB Executive Order N-18-124, unless the requirements and conditions under which this attestation has been issued will have changed considerably acc. to TSCA Title VI – §770.18(h)(i) and as long as the requirements of CARB remain as stringent as EPA's requirements. Latvijas Finieris, plant Lignums's CARB Executive Order N-18-124 was uploaded in the EPA CDX database with assigned Unique Form ID TPC-RTA-37672.

26 October 2018

Date



Dr.-Ing. Rico Emmler  
Certification Body

State of California  
AIR RESOURCES BOARD

EXECUTIVE ORDER N-18-124

Relating to CARB Approval for an Exemption from Third-Party Certification  
for Composite Wood Product Manufacturers that use  
Ultra-low-emitting Formaldehyde Resins under  
section 93120.3, title 17, California Code of Regulations

**Latvijas Finieris AS, mill Lignums**

WHEREAS, the California Air Resources Board (CARB) has adopted the "Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products" (the "ATCM"; title 17, California Code of Regulations, sections 93120-93120.12), which establishes formaldehyde emission standards for composite wood products;

WHEREAS, section 93120.1(a)(42) of the ATCM defines "ultra-low-emitting formaldehyde (ULEF) based resins" to mean "resins formulated such that average formaldehyde emissions are consistently below the Phase 2 emission standards in section 93120.2," for making hardwood plywood (HWPW), particleboard (PB), medium density fiberboard (MDF), or thin medium density fiberboard (tMDF);

WHEREAS, section 93120.3(d) of the ATCM allows manufacturers of HWPW, PB, MDF, and tMDF who use ULEF-based resins to apply for written approval from the Executive Officer for an exemption from the requirements of section 93120.3(b) of the ATCM;

WHEREAS, section 93120.3(d) of the ATCM allows manufacturers of HWPW, PB, MDF, and tMDF who use ULEF-based resins to submit an application for an exemption from the requirements of section 93120.3(b) of the ATCM to the Executive Officer, which includes: (A) a statement indicating which product types will be manufactured using ULEF-based resins for sale in California; (B) the chemical formulation of the candidate ULEF-based resin(s), including base resins, scavenger resins, scavenger additives, catalysts, and other additives as used in manufacturing; (C) the name of their CARB-approved third-party certifier (TPC); and (D) data on the emissions performance of the candidate ULEF-based resin(s);

WHEREAS, the data on emissions performance of the candidate ULEF-based resin required in section 93120.3(d) of the ATCM must be obtained by working with a CARB-approved TPC, and must include six months of routine quality control testing data, the correlation of the routine quality control testing data to primary or secondary testing data, and the results of two primary or secondary method tests, as required in Appendix 2 of section 93120.12 of the ATCM;

WHEREAS, section 93120.3(d)(2) of the ATCM requires that 90 percent of the six months of routine quality control testing data and the results of two primary or secondary method tests must be shown to be no higher than 0.04 parts per million (ppm), and that all data must be shown to be no higher than 0.05 ppm for HWPW and 0.06 ppm for PB, MDF, and MDF;

WHEREAS, section 93120.3(d)(5) of the ATCM provides that the Executive Officer shall approve the application and issue an Executive Order if the evidence submitted by the applicant is sufficient to demonstrate that the applicant has met the requirements specified in sections 93120.3(d)(1) and 93120.3(d)(2) of the ATCM;

WHEREAS, Latvijas Finieris AS, mill Lignums (Latvijas Finieris or the "applicant") submitted an original application that was received on June 13, 2012;

WHEREAS, the original application from Latvijas Finieris specified the range in product manufacturing parameters, applicable post-press product treatments, base resin trade name(s) and base resin manufacturer(s)/supplier(s), and other ingredients added to the base resin by the applicant to manufacture ULEF hardwood plywood-veneer core (HWPW-VC) products;

WHEREAS, CARB was provided base resin/adhesive information specifying the base resin polymer type and minimum and maximum values of all major and any minor ingredients in the base resin on a percent weight of solids basis;

WHEREAS, the Executive Officer found that the evidence submitted by the applicant meets the criteria specified in sections 93120.3(d)(1), 93120.3(d)(2) and 93120.3(d)(5) of the ATCM;

WHEREAS, the base resins/adhesive supplier, commercial name, and resin type are set forth in Confidential Attachment A;

WHEREAS, the original application from Latvijas Finieris was deemed complete on July 3, 2012, and Latvijas Finieris was issued Executive Order N-12-124 signed on July 6, 2012;

WHEREAS, section 93120.3(d) of the ATCM allows ULEF product manufacturers to apply for re-approval by CARB by submitting an updated application;

WHEREAS, Latvijas Finieris submitted an updated application for re-approval to CARB on July 21, 2014;

WHEREAS, the updated application from Latvijas Finieris was deemed complete on September 11, 2014, and Latvijas Finieris was issued Executive Order N-14-124 signed on September 12, 2014;

WHEREAS, Latvijas Finieris submitted an updated application for re-approval to CARB on September 23, 2016;

WHEREAS, the updated application from Latvijas Finieris was deemed complete on October 20, 2016, and Latvijas Finieris was issued Executive Order N-16-124 signed on October 24, 2016;

WHEREAS, Latvijas Finieris submitted an updated application for re-approval to CARB on October 9, 2018;

WHEREAS, the updated application from Latvijas Finieris was deemed complete on October 10, 2018;

WHEREAS, the Executive Officer finds that the completed, updated application demonstrated the ULEF manufacturer's ability to continue to comply with section 93120.3(d); and

WHEREAS, the Executive Officer approved Latvijas Finieris' request for re-approval, and it is appropriate that Executive Order N-16-124 be superseded by this Executive Order N-18-124.

NOW, THEREFORE, IT IS ORDERED that Latvijas Finieris is hereby approved as a ULEF manufacturer of HWPW-VC that is exempt from the requirements of section 93120.3(b) and Appendix 2 of section 93120.12 of the ATCM, provided that the following terms and conditions are met for products sold, supplied, offered for sale, or manufactured for sale in California:

1. Latvijas Finieris must use the commercial resins listed and suppliers listed in Section A of Confidential Attachment A of this Executive Order for the manufacture of ULEF HWPW-VC products.
2. The chemical formulation of the base resin used for the manufacture of ULEF composite wood products by Latvijas Finieris must be within the ranges specified in Section B of Confidential Attachment A of this Executive Order.
3. Latvijas Finieris is legally responsible for ensuring that the base resin is within the ranges specified in Section B of Confidential Attachment A.

4. The application rate of the base resin used for the manufacture of ULEF composite wood products by Latvijas Finieris must be within the ranges specified in Section C of Confidential Attachment A of this Executive Order.
5. Other chemical components of the base resins (such as sizing wax and release wax) used for the manufacture of ULEF HWPW-VC products by Latvijas Finieris must be within the ranges specified in Section D of Confidential Attachment A of this Executive Order.
6. The allowable operating parameters for press temperature and press time for the base resins used to manufacture the ULEF HWPW-VC products by Latvijas Finieris must be within the ranges specified in Section E of Confidential Attachment A of this Executive Order.
7. Only the composite wood products with the product names listed in Section F of Confidential Attachment A of this Executive Order are authorized under this Executive Order.

BE IT FURTHER ORDERED that this Executive Order N-18-124 supersedes Executive Order N-16-124, which was signed on October 24, 2016.

BE IT FURTHER ORDERED that Latvijas Finieris may change the resin system supplier listed in Section A of Confidential Attachment A of this Executive Order if the new resin supplier supplies the same resin type listed in Confidential Attachment A of this Executive Order, at least two primary or secondary method tests are performed on random samples selected by their CARB-approved TPC, and the Chief of the Risk Reduction Branch of the Transportation and Toxics Division is notified before Latvijas Finieris the resin for production.

BE IT FURTHER ORDERED that Latvijas Finieris must conduct confirmatory testing for a new resin supplier by demonstrating that the results of two primary or secondary method tests for the new resin system supplier are no higher than 0.04 ppm for the ULEF products authorized under this Executive Order.

BE IT FURTHER ORDERED that this Executive Order shall have a duration of two years from the date this Executive Order is signed; the applicant may apply for re-approval as provided in section 93120.3(d)(5) of the ATCM.

BE IT FURTHER ORDERED that the applicant must maintain records in electronic or hard copy form for two years, for review by CARB upon request, as specified in section 93120.3(g) of the ATCM.

BE IT FURTHER ORDERED that the applicant must notify the Executive Officer in writing within 30 days if there is any change in their product manufacturing parameters or base resin manufacturer(s) or supplier(s) that does not comply with any of the requirements, terms or conditions specified in the ATCM or this Executive Order.

Executed at Sacramento, California this 26<sup>th</sup> day of October, 2018.

A handwritten signature in cursive script, reading "Richard Boyd", is written over a horizontal line.

Richard Boyd, Chief  
Risk Reduction Branch  
Transportation and Toxics Division

## EPA TSCA Title VI -Attestation

**WKI-1244**

Expiry date: 13.02.2021

By order of the US Environmental Protection Agency (EPA), according the executive order 40 CFR Part 770:  
 "Formaldehyde Emission Standards for Composite Wood Products", TSCA Title VI,  
 relating to EPA approval of third party certifiers under Subpart B- EPA TSCA Title VI, §770.7,

### Fraunhofer Institute for Wood Research

Wilhelm-Klauditz-Institut WKI  
 Bienroder Weg 54E, 38108 Braunschweig, Germany

has assessed, that the below mentioned product fulfils the requirements according EPA TSCA Title VI, §770.18 (c) for an exemption from testing and certification requirements of § 770.20 for composite wood products as for the product a valid exemption from CARB is available, which is also valid under TSCA Title VI according to §770.18 (e)

The product:

#### Birch Plywood Riga Ply EXT

product type: plywood, unfaced  
 thickness range: 6.5 mm ≤ 50 mm

is manufactured at:

**A/S Latvijas Finieris  
 mill "Verems"  
 Lejas Ancupani  
 4604 Veremu parish  
 Latvia**

A supervision contract with no. 1244 between Fraunhofer Institute for Wood Research, Wilhelm-Klauditz-Institut WKI and the manufacturer is available. This attestation confirms the validity of CARB Executive Order N-19-345 as long as the requirements of the CARB remain as stringent as EPA's requirements. For more information about EPA's program, please visit EPA at: <https://www.epa.gov/formaldehyde/formaldehyde-emission-standards-composite-wood-products>



**Dipl.-Ing. Harald Schwab**  
 Head of the Third Party Certifier  
 Braunschweig, 13 February 2019



Executive Board of the Fraunhofer-Gesellschaft  
 Prof. Dr.-Ing. habil. Prof. E.h. Dr.-Ing. E.h. mult. Dr. h.c.  
 Reimund Neugebauer, President  
 Prof. (Univ. Stellenbosch) Dr. rer. pol. Alfred Gossner  
 Prof. Dr. rer. publ. ass. jur. Alexander Kurz  
 Dipl.-Kfm. Andreas Meuer  
 Prof. Dr. rer. nat. Georg Rosenfeld  
 Fraunhofer-Gesellschaft zur Förderung  
 der angewandten Forschung e. V., München  
 WKI is a registered mark of the  
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State of California  
AIR RESOURCES BOARD

EXECUTIVE ORDER N-19-345

Relating to CARB-Approval for an Exemption from Third-Party Certification for  
Composite Wood Product Manufacturers that use  
Ultra-low-emitting Formaldehyde Resins under  
section 93120.3, title 17, California Code of Regulations

**Latvijas Finieris AS, mill Verems**

WHEREAS, the California Air Resources Board (CARB) has adopted the "Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products" (the "ATCM"; title 17, California Code of Regulations, sections 93120-93120.12), which establishes formaldehyde emission standards for composite wood products;

WHEREAS, section 93120.1(a)(42) of the ATCM defines "ultra-low-emitting formaldehyde (ULEF) based resins" to mean "resins formulated such that average formaldehyde emissions are consistently below the Phase 2 emission standards in section 93120.2," for making hardwood plywood (HWPW), particleboard (PB), medium density fiberboard (MDF), or thin medium density fiberboard (tMDF);

WHEREAS, section 93120.3(d) of the ATCM allows manufacturers of HWPW, PB, MDF, and tMDF who use ULEF-based resins to apply for written approval from the Executive Officer for an exemption from the requirements of section 93120.3(b) of the ATCM;

WHEREAS, section 93120.3(d) of the ATCM allows manufacturers of HWPW, PB, MDF, and tMDF who use ULEF-based resins to submit an application for an exemption from the requirements of section 93120.3(b) of the ATCM to the Executive Officer, which includes: (A) a statement indicating which product types will be manufactured using ULEF-based resins for sale in California; (B) the chemical formulation of the candidate ULEF-based resin(s), including base resins, scavenger resins and additives, catalysts, and other additives as used in manufacturing; (C) the name of their CARB-approved third-party certifier (TPC); and (D) data on the emissions performance of the candidate ULEF-based resin(s);

WHEREAS, the data on emissions performance of the candidate ULEF-based resin required in section 93120.3(d) of the ATCM must be obtained by working with a CARB-approved TPC, and must include six months of routine quality control testing data, the correlation of the routine quality control testing data to primary or secondary testing data, and the results of two primary or secondary method tests, as required in Appendix 2 of section 93120.12 of the ATCM;



WHEREAS, section 93120.3(d)(2) of the ATCM requires that 90 percent of the six months of routine quality control testing data and the results of two primary or secondary method tests must be shown to be no higher than 0.04 parts per million (ppm), and that all data must be shown to be no higher than 0.05 ppm for HWPW and 0.06 ppm for PB, MDF, and tMDF;

WHEREAS, section 93120.3(d)(5) of the ATCM provides that the Executive Officer shall approve the application and issue an Executive Order if the evidence submitted by the applicant is sufficient to demonstrate that the applicant has met the requirements specified in sections 93120.3(d)(1) and 93120.3(d)(2) of the ATCM;

WHEREAS, Latvijas Finieris AS, mill Verems or the "applicant" submitted an original application that we received on January 31, 2019;

WHEREAS, the application from Latvijas Finieris AS, mill Verems was deemed complete on February 7, 2019;

WHEREAS, the application from Latvijas Finieris AS, mill Verems specifies the range in product manufacturing parameters, applicable post-press product treatments, base resin trade name(s) and base resin manufacturer(s)/supplier(s), and other ingredients added to the base resin by the applicant to manufacture ULEF hardwood plywood-veneer core (HWPW-VC);

WHEREAS, CARB was provided base resin/adhesive information specifying the base resin polymer type, and minimum and maximum values of all major and any minor ingredients in the base resin on a percent weight of solids basis;

WHEREAS, the base resin/adhesive supplier, commercial name and resin type are set forth in Confidential Attachment A;

WHEREAS, section 93120.3(d)(5) of the ATCM provides that the Executive Officer shall approve the application and issue an Executive Order if the evidence submitted by the applicant is sufficient to demonstrate that the applicant has met the requirements specified in section 93120.3(d)(2) of the ATCM; and

WHEREAS, the Executive Officer finds that the completed application demonstrated the ULEF manufacturer's ability to comply with section 93120.3(d) of the ATCM.

NOW, THEREFORE, IT IS ORDERED that Latvijas Finieris AS, mill Verems is hereby approved as a ULEF manufacturer of HWPW-VC that is exempt from the requirements of section 93120.3(b) and Appendix 2 of section 93120.12 of the ATCM, provided that the following terms and conditions are met for products sold, supplied, offered for sale, or manufactured for sale in California:

1. Latvijas Finieris AS, mill Verems must use the commercial resins listed and suppliers listed in Section A of Confidential Attachment A of this Executive Order for the manufacture of ULEF HWPW-VC products.
2. The chemical formulation of the base resins used for the manufacture of ULEF composite wood products by Latvijas Finieris AS, mill Verems must be within the ranges specified in Section B of Confidential Attachment A of this Executive Order.
3. As specified in Section B of Confidential Attachment A, Latvijas Finieris AS, mill Verems is legally responsible for ensuring that the base resin is within the ranges specified in Section B.
4. The application rate of the base resins used for the manufacture of ULEF composite wood products by Latvijas Finieris AS, mill Verems must be within the ranges specified in Section C of Confidential Attachment A of this Executive Order.
5. Other chemical components of the base resins (such as sizing wax and release wax) used for the manufacture of ULEF HWPW-VC products by Latvijas Finieris AS, mill Verems must be within the ranges specified in Section D of Confidential Attachment A of this Executive Order.
6. The allowable operating parameters for press temperature and press time for the base resins used to manufacture the ULEF HWPW-VC products by Latvijas Finieris AS, mill Verems must be within the ranges specified in Section E of Confidential Attachment A of this Executive Order.
7. Only the composite wood products with the product names listed in Section F of Confidential Attachment A of this Executive Order are authorized under this Executive Order.

BE IT FURTHER ORDERED that Latvijas Finieris AS, mill Verems may change the resin system supplier listed in Section A of Confidential Attachment A of this Executive Order if the new resin supplier supplies the same resin type listed in Confidential Attachment A of this Executive Order, at least two primary or secondary method tests are performed on random samples selected by their CARB-approved TPC, and the Chief of the Risk Reduction Branch of the Transportation and Toxics Division is notified before Latvijas Finieris AS, mill Verems uses the resin for production.

BE IT FURTHER ORDERED that Latvijas Finieris AS, mill Verems must conduct confirmatory testing for a new resin supplier by demonstrating that the results of two primary or secondary method tests for the new resin system supplier are no higher than 0.04 ppm for the ULEF products authorized under this Executive Order.

BE IT FURTHER ORDERED that this Executive Order shall have a duration of two years from the date this Executive Order is signed; the applicant may apply for re-approval as provided in section 93120.3(d)(5) of the ATCM.

BE IT FURTHER ORDERED that the applicant must maintain records in electronic or hard copy form for two years, for review by CARB upon request, as specified in section 93120.3(g) of the ATCM.

BE IT FURTHER ORDERED that the applicant must notify the Executive Officer in writing within 30 days if there is any change in their product manufacturing parameters or base resin manufacturer(s) or supplier(s) that does not comply with any of the requirements, terms or conditions specified in the ATCM or this Executive Order.

Executed at Sacramento, California this 13<sup>th</sup> day of February, 2019.

Richard Boyd

Richard Boyd, Chief  
Risk Reduction Branch  
Transportation and Toxics Division