

HOKLAS Supplementary Criteria No. 53

‘Chemical Testing’ Test Category – Accreditation of Laboratories for Testing of Composite Wood Products for Formaldehyde Emission to Support the US Environmental Protection Agency (EPA) Toxic Substances Control Act (TSCA) Title VI Third-Party Certification Program

1 INTRODUCTION

- 1.1 This criteria document serves to clarify and supplement the requirements of ISO/IEC 17025 for the accreditation of laboratories under the test category of ‘Chemical Testing’ for supporting the US Environmental Protection Agency (EPA) Toxic Substances Control Act (TSCA) Title VI Third-Party Certification Program. This document shall be read in conjunction with ISO/IEC 17025, HKAS policies for laboratory accreditation under HOKLAS, relevant HKAS and HOKLAS supplementary criteria documents and the latest 40 CFR Part 770. This criteria document is applicable to laboratories seeking accreditation to support the EPA TSCA Title VI Third-Party Certification Program pursuant to 40 CFR Part 770.
- 1.2 To serve as a laboratory supporting the EPA TSCA Title VI Third-Party Certification Program, a laboratory shall comply at all times with the requirements set out in the latest 40 CFR Part 770 ‘Formaldehyde Standards for Composite Wood Products’ and it shall be accredited by an EPA-recognised laboratory accreditation body.
- 1.3 HKAS is a recognised product and laboratory accreditation body under the EPA TSCA Title VI Third-Party Certification Program. After a laboratory has been accredited by HKAS to ISO/IEC 17025 under HOKLAS with a scope of accreditation that includes composite wood products and 40 CFR Part 770 ‘Formaldehyde Standards for Composite Wood Products’, it may provide testing service to support the EPA TSCA Title VI Third-Party Certification Program.
- 1.4 HKAS Executive will notify EPA immediately in writing and update the HKAS website of any action it takes against an accredited laboratory supporting the EPA TSCA Title VI Third-Party Certification Program that adversely affects the accreditation status of that laboratory relating to the Program, such as suspension or termination of accreditation, reduction of

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scope of accreditation, and imposing conditions on accreditation.

2 SCOPE OF ACCREDITATION

- 2.1 HKAS provides accreditation under HOKLAS for laboratories seeking accreditation to support the EPA TSCA Title VI Third-Party Certification Program pursuant to the latest 40 CFR 770.

3 TERMS AND DEFINITIONS

- 3.1 The term ‘shall’ is used throughout this document to indicate those provisions which are mandatory.

4 GENERAL REQUIREMENTS

- 4.1 A laboratory accredited by HKAS for the EPA TSCA Title VI Third-Party Certification Program shall comply at all times with the requirements set out in the latest 40 CFR Part 770 ‘Formaldehyde Standards for Composite Wood Products’ which is available from the EPA website ‘<https://www.epa.gov/formaldehyde>’. In case the laboratory has failed to comply with any provision of the latest 40 CFR Part 770, it shall notify both EPA (through the EPA TSCA Title VI Third-Party Certifier to which it is providing testing service) and HKAS Executive within 72 hours of the time the laboratory identifies the deficiency. The notice shall include a description of the steps taken to address the deficiency.
- 4.2 The laboratory shall allow HKAS Executive to examine all records and documents for verification of compliance with the requirements of the EPA TSCA Title VI Third-Party Certification Program.
- 4.3 On request, the laboratory shall accept EPA to observe its assessments conducted by HKAS in relation to the EPA TSCA Title VI Third-Party Certification Program.
- 4.4 The laboratory shall authorise HKAS Executive to share with EPA information and copies of assessment documentation in relation to the EPA TSCA Title VI Third-Party Certification Program, such as assessment schedule, assessment reports, observation and action records, corrective action plans and evidence of actions taken.

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- 4.5 The laboratory shall notify HKAS Executive within 30 days of any changes in personnel qualifications or procedures used in relation to the EPA TSCA Title VI Third-Party Certification Program.

5 IMPARTIALITY

- 5.1 The laboratory shall act impartially when performing activities under the EPA TSCA Title VI Third-Party Certification Program.
- 5.2 The laboratory shall not have a financial interest in a panel producer, fabricator, laminated product producer, importer, designer, distributor or retailer of composite wood products.
- 5.3 The laboratory shall ensure that its management personnel and personnel involved in related testing of composite wood products are not involved in activities within the same or separate legal entity that may compromise the impartiality of its testing, such as advocacy or consulting activities.
- 5.4 The laboratory shall ensure that personnel of the same or separate legal entity involved in activities such as advocacy or consulting are not involved in the management and related testing of composite wood products of the laboratory.
- 5.5 The laboratory shall ensure that its management personnel and personnel involved in related testing of composite wood products sign a conflict of interest statement attesting that they will receive no financial benefit from the outcome of the testing.

6 RESOURCE REQUIREMENTS

- 6.1 The laboratory shall have demonstrated experience in performing or verifying formaldehyde emissions testing on composite wood products, including experience with test method ASTM E1333-14 or ASTM D6007-14, if used, and experience in evaluating correlation between test methods.
- 6.2 Facilities that conduct the formaldehyde testing required by the EPA TSCA Title VI Third-Party Certification Program shall follow the procedures and specifications, such as testing conditions and loading ratios, of the test method being used.

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- 6.3 All equipment used in the formaldehyde testing required by the EPA TSCA Title VI Third-Party Certification Program shall be calibrated and otherwise maintained and used in accordance with the equipment manufacturer's instructions.

7 PROCESS REQUIREMENTS

- 7.1 Testing shall be performed using ASTM E1333-14 or ASTM D6007-14 or, for quality control testing, any other methods specified under 40 CFR 770.20(b). If a method other than ASTM E1333-14 is used, the laboratory shall be able to demonstrate its equivalence with ASTM E1333-14 pursuant to 40 CFR 770.20(d).

Note: EPA requires that such equivalence or correlation shall be demonstrated by EPA TSCA Title VI Third-Party Certifiers or panel producers, respectively, at least once per year for each testing apparatus or whenever there is a significant change in equipment, procedure, or the qualifications of testing personnel. Once equivalence or correlation have been established for three consecutive years, equivalence or correlation shall be demonstrated at least once every two years or whenever there is a significant change in equipment, procedure, or the qualifications of testing personnel.

- 7.2 The laboratory shall participate in the California Air Resources Board (CARB) interlaboratory comparison for formaldehyde emissions when offered. In lieu of participation in the CARB interlaboratory comparison, the laboratory shall participate in an EPA-recognised proficiency testing program, if available.
- 7.3 The laboratory shall be able to support the EPA TSCA Title VI Third-Party Certifier to which it is providing testing service to meet the requirements stipulated in 40 CFR 770.7(c)(4) and 40 CFR 770.20.