

Proposed Labeling Requirements	
EPA's proposed requirements: finished goods and component parts sold and/or supplied as individual items to anyone in commerce [per proposed 40 CFR 770.45]	EPA's proposed requirements: panels or bundles of panels [per proposed 40 CFR 770.45]
Format requirements: <ul style="list-style-type: none"> • The label may be applied as a stamp, tag, sticker, or bar code • Labels must be on every finished good or every box containing finished goods 	Format requirements: <ul style="list-style-type: none"> • Can be labeled by panel or bundle
Content requirements: <ul style="list-style-type: none"> • Fabricator's name • The date the finished good was produced • A statement that the finished goods are TSCA Title VI compliant • Note: distributors and wholesalers who receive labeled bundles of regulated composite wood products and then divide and repackage them, whether in bundles or separately, must label each separate bundle or item with the same information as required on the original label • Note: labels on bundles that are not so repackaged must be kept intact by distributors, wholesalers, and retailers 	Content requirements: <ul style="list-style-type: none"> • Statement that the products are TSCA Title VI certified • Panel producer's name or number • The lot or batch number • Marking to denote the product was made with NAF or ULEF resin, if the panel is subject to the reduced testing provisions in §§ 770.17 and 770.18 • The number of the TSCA Title VI Accredited TPC • Panels imported into or transported across the United States for quarterly or quality control testing purposes in accordance with § 770.20 must be labeled "For TSCA Title VI testing only, not for sale in the United States"

Proposed Record Keeping Requirements			
EPA's proposed requirements: distributors, wholesalers, and retailers [per proposed 40 CFR 770.40]	EPA's proposed requirements: importers, fabricators, and laminated product producers [per proposed 40 CFR 770.30]	EPA's proposed requirements: for laminated product producers whose products are exempt from the definition of hardwood plywood [per proposed 40 CFR 770.40]	EPA's proposed requirements: panel producers [per proposed 40 CFR 770.40]
<ul style="list-style-type: none"> • Invoices • Bills of lading • Copies of labels used 	<ul style="list-style-type: none"> • Records identifying the panel producer and the date the composite wood products were produced • Records identifying the date the composite wood products were purchased 	<ul style="list-style-type: none"> • Resin trade name, resin manufacturer contact information, resin supplier contact information, and resin purchase records • Panel producer contact information and panel 	<ul style="list-style-type: none"> • Records of all quarterly emission testing and all ongoing quality control testing • Production records, including a description of the composite wood product(s), the date of manufacture, lot or batch

	<ul style="list-style-type: none"> • Bills of lading or invoices that include a written affirmation from the supplier that the composite wood products are compliant with this subpart • Importers must also comply with the import certification regulations for “Chemical Substances in Bulk and As Part of Mixtures and Articles,” as found at 19 CFR 12.118 through 12.127 or as later promulgated 	<p>purchase records</p> <ul style="list-style-type: none"> • For panels produced in-house, records demonstrating that the panels have been certified by an accredited TPC • For resins produced in-house, records demonstrating the production of NAF resins 	<p>numbers, and tracking information allowing each product to be traced to a specific lot number or batch produced</p> <ul style="list-style-type: none"> • Records of changes in production • Records demonstrating initial and continued eligibility for the reduced testing provisions in §§ 770.17 and 770.18, if applicable • Purchaser information for each composite wood product • Transporter information for each composite wood product • Information on the disposition of non-complying lots • Copies of labels used • Monthly product data reports for each production facility [to be submitted to TPCs]
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