

To All TPCs Under The EPA TSCA Title Vi Program:

The following FAQ was added to the EPA's website for TSCA Title VI. Please keep IAS informed of your plans to do quarterly remote surveillance of your mills and follow the instructions below.

13. In the event of unsafe conditions in the geographic area that would prevent a third-party certifier (TPC) from traveling in-person to that area, how can a TPC work with one of its TSCA Title VI-certified composite wood product manufacturing panel producers to conduct quarterly inspections (including sampling collections of composite wood products) to ensure TSCA Title VI compliance until the unsafe conditions are no longer present?

In the event of unsafe conditions (e.g., natural disasters, outbreaks, political unrest, epidemics, and pandemics) in the area of a composite wood product manufacturing panel producer, in order to conduct the required quarterly inspections and sample collections, the TPC could conduct a remote quarterly inspection via teleconference to satisfy the requirements of 40 CFR 770.7(c)(4)(i)(F), and work with the panel producer quality control manager at that time to select, package, sign, and ship the TPC panels/samples for the quarterly test according to 40 CFR 770.20(c). TPCs and panel producers should also remain in close communication with each to ensure any changes or developments that might affect the panel producer or product type certification are managed according to the TSCA Title VI regulations. The panel producer and TPC should also document each unsafe conditions occurrence for auditing purposes, and the TPC should notify EPA through its TSCA Title VI accrediting body/third-party certifier general mailbox (TSCATitleVI-AB@epa.gov) when this remote method of quarterly inspection is being used. The standard practice for a TPC providing certification services for composite wood panel producers remains that a TPC conducts in-person quarterly inspections and sample collection, packaging, signature, and shipping for quality control testing.