

The procedures to be a US EPA and CARB certified panel producer

A. Panel producer Preparation:

1. Training Quality Assurance requirement and QC employees (Personnel who conduct chemical analysis test in Formaldehyde Emission test at the Panel producer).

MUTU Certification provides two kinds of training, which are:

- (1) Preparation of Quality Assurance requirements for Panel producer based on EPA TSCA Title VI 40 CFR Part 770.21 and CARB ATCM Appendix 2, Section 93120.12, California Code of Regulation
- (2) Formaldehyde emission test based on ASTM D 6007, ASTM D 5582, JIS A 1460 : 2001, EN 120, and EN 717-2 (called as small scale test)

The training must be attended by QC Manager and QC Employee personnel at each Panel producer's plant.

2. QC facilities for conduct LFE testing at Panel Producer

Panel producer must prepare QC facilities for conducting formaldehyde test based on clause A.1.b such as spectrophotometer, desiccators, glassware, chemical reagent, etc.

3. Quality Control Manual (QC Manual)

After training, Panel producer must set up QC Manual and other procedures based on EPA TSCA Title VI 40 CFR Part 770.21 and CARB ATCM Appendix 2, Section 93120.12, California Code of Regulation.

The manual must contain, at a minimum, the following:

- (1) A description of the organizational structure of the quality control department, including the names of the quality control manager and quality control employees;
- (2) A description of the sampling procedures to be followed;
- (3) A description of the method of handling samples, including a specific maximum time period for analyzing quality control samples
- (4) A description of the frequency of quality control testing;
- (5) A description of the procedures used to identify changes in formaldehyde emissions resulting from production changes (*e.g.*, increase in the percentage of resin, increase in formaldehyde/urea molar ratio in the resin, or decrease in press time);
- (6) A description of provisions for additional testing;
- (7) A description of recordkeeping procedures;
- (8) A description of labeling procedures;
- (9) The average percentage of resin and press time for each product type;
- (10) A description of product types, and if applicable, a description of product variables covered under each product type;
- (11) Procedures for reduced quality control testing, if applicable, and
- (12) Procedures for handling non-complying lots, including a description of how the panel producer will ensure compliance with the notification requirements.

4. Establishment of correlation value between Primary or Secondary method test and small scale method test

Each Panel producer shall work with MUTU Certification to establish the correlation value for each product type and production line. At least 5 (five) data pairs must be used to establish the correlation value. Five samples must be tested using Panel producer's facilities (small scale test) and 5 sets of samples must be tested using MUTU Certification Primary or Secondary method facility. If data does not correlate, additional sample may be required or re-correlation.

All formaldehyde emission value of small scale method test conducted at Panel producer's plant must be shown to correlate to Primary or Secondary method value.

5. Establishment of Quality Control Limit (QCL)

After establishing of correlation value, factory must establish Quality Control Limit (statistical process control). QCL must be made using minimum 30 quality control tests data. The QCL will be calculated by Panel producer work with MUTU Certification.

B. Certification process

After completing the contract between Panel producer and MUTU Certification, the certification process will be conducted as follows:

1. Document Review

Panel producer shall submit the Quality Control Manual, Procedures and other relevant documents to MUTU Certification to be reviewed. MUTU Certification will give comments on the sufficiency of the documents.

2. Initial On-site Inspection

2.1 Initial Audit

MUTU Certification will conduct audit at least once to the Panel producer's plant. The purpose of the audit is to verify that quality assurance of Panel producer complies with the requirements. The matters to be checked are:

- (1) Verify that each panel producer has adequate quality assurance and quality control procedures and is complying with the applicable quality assurance and quality control requirements;
- (2) Verify each panel producer's quality control test results compared with test results from ASTM E1333-10 and ASTM D6007-02, if used, by having the TPC laboratory conduct quarterly tests and evaluate test method equivalence and correlation as required;
- (3) In consultation with the panel producer, establish quality control limits (QCLs) for formaldehyde emissions, and, if applicable, shipping quality control limits or other formaldehyde emission limits, for each panel producer and product type;
- (4) Establish, for each panel producer, the process that will be used to determine if products are exceeding the applicable QCL;
- (5) Provide its CARB or EPA TPC number to each panel producer for labeling and recordkeeping; and
- (6) Inspect each panel producer, its products, and its records at least quarterly.

2.2 Initial Primary or Secondary method Testing

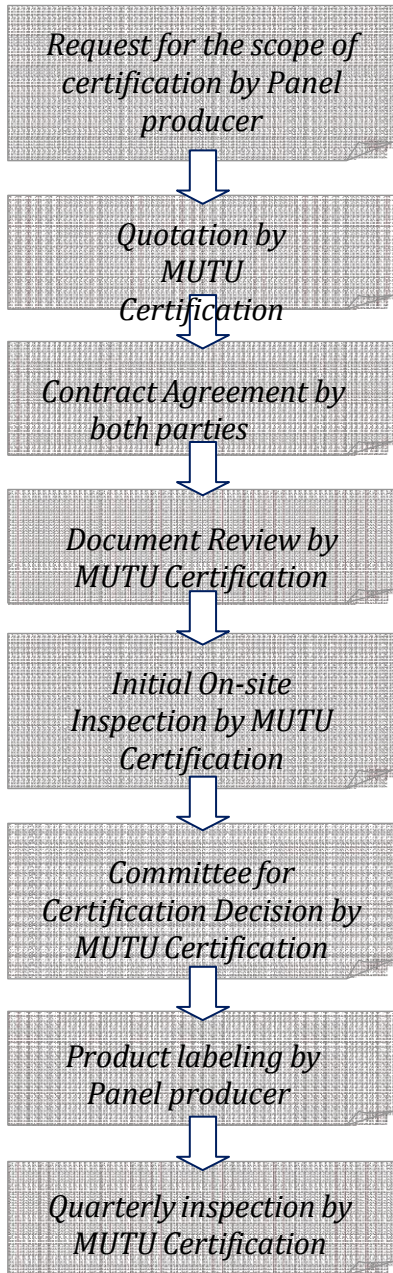
MUTU Certification shall work with Panel producer to ensure that the products of the Panel producer are complied with formaldehyde emission standards.

During Initial On-site Inspection, auditor MUTU Certification shall work with Panel producer to choose samples randomly from a single lot of each product type and production line to be certified, handling and shipping the sample to laboratory of MUTU CERTIFICATION to be tested based on Primary or Secondary Method Test.

3. Certification

If Panel producer meet all requirements, the Panel producer will be given an EPA-recognized and or ARB- approved TPC number and is allowed to label its products with the EPA TSCA Title VI and or CARB ATCM 93120.2.(a) California Code of Regulation.

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When MUTU Certification receives an initial contact from a panel producer, MUTU Certification will submit the "Request for the scope of Certification of Panel Producer" form.

After receiving Request for the scope, MUTU Certification will submit a costs and fees necessary for the certification.

If panel producer agree with the quotation, MUTU Certification and the panel producer must sign a contract agreement.

Panel producer shall submit QC Manual, Procedure and other relevant documents to be reviewed by MUTU Certification.

MUTU Certification will conduct initial audit to verify quality assurance of the panel producer and taking sample for initial testing.

MUTU Certification will arrange committee to evaluate the audit and testing report. Initial On-site Inspection must be re-conducted if product testing result does not comply with formaldehyde emission standards.

The certified panel producer is allowed to put EPA-recognized TPC number at the product or bale, and can export the product to United States.

MUTU Certification will conduct inspection at least once per quarter to verify that quality assurance system is well implemented at the panel producer and the products are complied with the applicable formaldehyde emission standards.