



ARB EO W-25-024
EPA TPC-APP-6364

TPC-024

LA.P.I. - Laboratorio Prevenzione Incendi SpA - Via della Quercia, 11 - Prato

NAF EXEMPTION APPROVAL

NAF-A-01/25

Invernizzi SpA

Approval to Use No-Added Formaldehyde Resins by Composite Wood Product Manufacturers under:

- ✓ Section 93120.3(c) of ATCM, California Code of Regulations "Airborne Toxic Control Measure to Reduce Formaldehyde Emissions from Composite Wood Products"
- ✓ 40 CFR 770 (§770.17) – EPA TSCA Title VI "Formaldehyde Emission Standards for Composite Wood Products".

LA.P.I. Laboratorio Prevenzione Incendi SpA, as an approved and accredited Third Party Certifier (TPC-024) according to the above reported Regulations, has received on 24th September 2024 an Application for NAF Exemption from Composite Wood Products Manufacturer Invernizzi S.P.A. (Strada P.le per Gussola - 26030 SOLAROLO RAINERIO (CR) – ITALY); the Application from Invernizzi SpA was deemed complete on 30/04/2025.

The NAF Exemption Application from Invernizzi SpA was complete of information about 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 NAF hardwood plywood-veneer core (HWPW-VC) products (see Confidential Attachment 1);

Moreover, LAPI was provided with 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 (see Confidential Attachment 1);

Moreover, LAPI checked that the resin declared by Invernizzi SpA was included in CARB-Approved NAF Resins List (updated 15/01/2025): the result of the check was positive;

Moreover, as required by section 93120.3(c)(1) of the ATCM and by § 770.17(a)(3) of TSCA Title VI, Invernizzi SpA submitted the results of one primary method test for NAF product listed in Confidential Attachment 1; the Test Report issued by TPC 024 LAPI Laboratory on 18/12/2024 gave a result compliant with applicable requirement (≤ 0.04 ppm).

Moreover, as required by section 93120.3(c)(1) of the ATCM and by § 770.17(a)(4) of TSCA Title VI, Invernizzi SpA submitted the results of three months of routine quality control testing data and the correlation of the routine quality control testing data to primary method testing data; the Test Reports and Correlation Report issued by TPC 024 LAPI Laboratory on 05/12/2024 give evidence of results compliant with applicable requirements (90 percent of the three months of routine quality



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control testing data and the results of one primary or secondary method test 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).

In consideration of all the above points, the Application for NAF Exemption issued by Invernizzi SpA for the products listed in Confidential Attachment 1 is

APPROVED

by TPC 024 LAPI SpA, provided that provided that the following terms and conditions are met for products sold, supplied, offered for sale, or manufactured for sale in California and in all U.S.A.:

- a) Invernizzi SPA must use the commercial resin listed and supplier listed in Confidential Attachment 1 for the manufacture of NAF HWPW-VC products.
- b) As specified in Confidential Attachment 1, Invernizzi SPA is legally responsible for ensuring that the base resin specifications are within the ranges specified in the original application and any subsequent amendments of this Approval.
- c) The application rate of the base resins used for the manufacture of NAF HWPW - VC composite wood products by Invernizzi SPA must be within the ranges specified in Confidential Attachment 1.
- d) Other chemical components of the base resins (such as sizing wax and release wax) used for the manufacture of NAF composite wood products by Invernizzi SPA must be within the ranges specified in Confidential Attachment 1.
- e) The allowable operating parameters for press temperature and press time for the base resins used to manufacture the NAF HWPW-VC composite wood products by Invernizzi SPA must be within the ranges specified in Confidential Attachment 1.
- f) Only the composite wood products with the product names listed in Attachment 1 are authorized under this NAF Exemption Approval **NAF-A-01/25**.

Moreover:

- ✓ Invernizzi SPA may change the resin system supplier listed in Confidential Attachment 1 if the new resin supplier supplies the same resin type listed in Confidential Attachment 1, confirmatory emission tests are conducted, and TPC 024 is notified in advance of using the new resin system for production.
- ✓ Invernizzi SPA must conduct confirmatory testing for any new resin supplier by demonstrating that the results of one primary or secondary method test for the new resin system supplier are no higher than 0.04 ppm for the NAF products authorized under this NAF Exemption Approval.
- ✓ This NAF Exemption Approval shall have a duration of two years, and the applicant may apply for re-approval as provided in section 93120.3(c)(4) of the ATCM and in § 770.17 (e)



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of TSCA Title VI; the specified application for re-approval requires the applicant to submit the results of at least one primary or secondary method test for the NAF products listed in Confidential Attachment 1 based on panels or a set of panels randomly selected and tested by a CARB/EPA-approved TPC, and the chemical formulation of the NAF-based resins. In addition, at least one primary or secondary method test must be provided for each facility, which operates in accordance with this Approval, and the applicant must also include a current list of their resin suppliers.

- ✓ TPC 024 LAPI SpA may review and, for good cause, modify or revoke this NAF Exemption Renewal in case documented evidences that the fulfillment of the requirements on which the Renewal is based is no longer granted by Invernizzi SpA.

This NAF Exemption Approval *NAF-A-01/25* has a duration of two years from the date it is signed and issued by TPC 024 LAPI SpA.

This NAF Exemption *NAF-A-01/25* complies with both TSCA Title VI and CARB requirements.

The Applicant may apply for re-approval as provided in section 93120.3(c)(4) of the ATCM and in § 770.17 (e) of TSCA Title VI.

The applicant must maintain records in electronic or hard copy form for two years, for review by TPC 024 LAPI SpA.

The applicant must notify TPC 024 in writing within 30 days of any change in their product manufacturing parameters or base resin manufacturer(s) or supplier(s) that constitute a modification outside the scope of their application for reduced testing under or an exemption from the requirements in section 93120.3(b) of the ATCM and § 770.20, 770.15 and 770.40(b) of TSCA Title VI.

Issued in Prato (PO) - ITALY on 21st May 2025.

LA.P.I. – Laboratorio Prevenzione Incendi SpA

Certification Manager

Dr. David Borsini