



**ALL PRODUCTS IMPACT THE ENVIRONMENT
FOR ESP PROGRAM CRITERIA, VISIT KCMA.ORG**

New Participant ESP Guidebook

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This Guidebook was developed to help first time ESP participants obtain ESP certification. It is based on the information provided in the ESP Guidance Document and ESP 01-24 standard. The intent is to provide a first time participant with example documents for enough of the sections of the standard to earn the minimum required 70 points for certification and comply with the two mandatory requirements.

The sections in this Guidebook are those that are most often used by current ESP participants for their ESP certification. Not all sections of the ESP standard are included in this Guidebook. It is highly recommended that once this Guidebook is completed, the ESP Guidance Document is reviewed for additional sections where points can be earned towards certification.

Included in this Guidebook are example documents based on actual documents submitted by an ESP participant when renewing their certification. These documents can be used as templates for the documents you will need to submit in support of points claimed towards certification. The practices and policies detailed in each of the documents you submit for ESP certification must be implemented in your facility. In this Guidebook, all example documents have a box around them.

The example documents are templates to be used in the development of documents for your certification submittal. Some of the statements, policies, and practices might, or might not, be applicable to your facility. You will most likely need to edit each example document provided in this Guidebook according to what is being done in your facility.

The ESP standard contains five chapters and two mandatory requirements. Points must be earned in each of the five chapters, a minimum of 70 points need to be earned, and the two mandatory practices met. As previously mentioned, this Guidebook does not contain all the sections of the ESP standard, just those that are most commonly used.

Mandatory Requirements

- 1) All particleboard, MDF and hardwood plywood that is manufactured or purchased must be 100% compliant with EPA TSCA Tile VI or relevant Canadian Environmental Protection Act formaldehyde emission limits.
- 2) Manufacturer has a firm commitment to environmental quality as evidenced by a written policy statement.

Guidance for Mandatory Requirements:

- 1) *Provide a signed statement attesting all panel products manufactured or purchased are in compliance with TSCA Title VI requirements. Beginning March 22, 2019, all particleboard, MDF and hardwood plywood that is manufactured or purchased must comply with the applicable TSCA Title VI formaldehyde emission limits. Third party certification of panel products is required. Purchase of panel products not in compliance with TSCA Title VI limits after March 22, 2019, will disqualify a manufacturer for participation in the KCMA Environmental Stewardship Program. Suppliers of panel products or component parts containing panel products are required by TSCA Title VI to declare such compliance to cabinet manufacturers on the bill of lading or the invoice.*
- 2) *Provide a copy of the policy statement.*

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Guidebook Documents

- 1) The ESP 01-24 Application contains a statement, checkbox, and signature line to be used to demonstrate compliance with this mandatory requirement. When completing the ESP 01-24 Application, make sure to have a corporate officer read the statement, check the box, and sign. See highlighted section below.

Mandatory Requirement 1

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The following declarations are to be completed by an officer of the company:

- I affirm to the best of my knowledge that in the past twelve months 100% of the manufacture or purchase of particleboard, MDF and hardwood plywood comply with current CARB ATCM or TSCA Title VI limits for the respective products.
- I agree to report to KCMA within 60 days of any local, state or federal citation in excess of \$50,000 per violation explaining the circumstances of the citation and violation. Upon final determination by the regulator that the violation was willful, grossly negligent or reckless, the ESP Committee (subject to KCMA Board approval) may terminate, for a period of no less than 12 months, the ESP participant's participation in the ESP Program. The ESP participant shall have the right to a review hearing regarding such termination by a third party arbitrator following ANSI arbitration procedures. The cost of such arbitration will be borne by the ESP participant.

If claiming points in the following section, the box must be checked:

- Section V. B. I attest there have been no non-compliance citations from any Federal, state or local environmental regulatory agency in the previous 12 months exceeding \$15,000 per citation.

Signature: _____ Date: _____

Printed Name: _____

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2) Below is an example of a policy statement meeting Mandatory Requirement 2.

Environmental Policy Statement – Mandatory Requirement 2

We expect all employees to balance the needs of the company with careful, responsible stewardship of the environment. We believe the scope of this stewardship includes human and financial resources, corporate facilities, community, the natural environment and natural resources. With an emphasis on personal responsibility, we expect wise and effective use of all resources. We will have documented policies for making decisions with regard to reducing waste, recycling waste and manufacturing byproducts, conserving energy, and using recycled or rapidly-renewable materials in our products and processes.

ENERGY CONSERVATION POLICY

We strive to understand and reduce the impact of our processes, policies and product on greenhouse gas emissions by reducing energy consumption. Some of the ways we will do this include: installing energy-conserving lighting and motors; evaluating the use of biomass rather than fossil fuels when feasible; adding hybrid vehicles to our fleet, etc. We understand energy conservation to include our choice of materials, processes, policies and equipment. We expect value-added, responsible use of resources so we might ensure future sustainability and quality of life.

NATURAL RESOURCE STEWARDSHIP POLICY

We strive to understand and utilize recycled and rapidly-renewable materials and suppliers or strategic partners who practice responsible stewardship. We consider this policy to include the effective use of raw materials and finding ways to recycle and or reuse our byproducts. We favor the use of recycled-content materials when feasible. We support any and all organized recycling programs and participate as a matter of corporate philosophy (e.g. paper, cardboard, beverage containers, scrap metal, transport packaging, wood fiber, etc.). We will favor the use of products or suppliers that share this philosophy.

I. Air Quality & Pollution Prevention:

A. Manufacturer has a documented energy conservation program. 5 Points.

Guidance for I A:

Provide a copy of the written program. It should list practices your company utilizes to save energy. Also list energy conservation programs your company participates in and objectives you achieve.

Guidebook Document for I A:

Energy Conservation Policy, I.A.

(Company Name) is firmly committed to conserving energy. We ask all employees to follow the guidelines set forth in our Energy Conservation Program as stated below:

- 1) All Production Equipment: all production equipment is to be turned off when not in use.
- 2) Compressed Air: All compressed air lines will be checked for leaks monthly and any leaks found will be repaired.
- 3) Inside Lighting: all to be turned off when not in use. Motion sensors are used to operate lights. Lights will be replaced with LED as available.
- 4) Office Equipment: Energy Star rated office equipment will be used.
- 5) Temperature Control: Programmable thermostats are used to maintain occupied spaces at 74F in the summer and 68F in the winter. Unoccupied spaces are maintained at 80F in the summer and 60F in the winter.
- 6) Alternative Energy: An effort will be made to source renewable energy from our supplier.
- 7) Equipment Replacement: When sourcing replacement equipment, energy efficiency of the equipment will be a priority.

These are several of the recent upgrades made to increase the energy efficiency of our operation: (List current upgrades)

II. Resource Sustainability:

- A. 80% or more of the annual manufacture or purchase of particleboard meets the CPA ECC 4-11/19 or Benchmark CWSS standard. 10 Points.
- B. 80% or more of the annual manufacture or purchase of MDF meets the CPA ECC 4-11/19 or Benchmark CWSS standard. 10 Points.
- I. Manufacturer has a documented wood trade compliance or due diligence policy. 10 Points.
- J. Manufacturer has a documented policy that voluntarily prohibits the use of wood species listed in Appendices I, II, or III of the Convention on International Trade in Endangered Species (CITES). 5 Points.

Guidance for II A & B:

Manufacturers will send KCMA a detailed spreadsheet listing the previous twelve months of purchases of panel products. First time applicants need only supply the most recent four months of panel consumption. There would be one entry per month per supplier per panel manufacturer for all of the products purchased in that month with columns to show what quantity was purchased. This single entry would likely incorporate several shipments and several invoices for a

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month, but only one panel manufacturer and one distributor listing. If 100% of your purchases of MDF and particleboard are from CPA and/or Benchmark certified mills, submit a signed statement attesting such and provide the certificates from CPA and/or Benchmark for each mill listed on the sheet.

The verification of this spreadsheet would be a three step process. The detailed spreadsheet would be submitted to KCMA during the application or renewal process.

- 1. If less than 100% of the MDF and particleboard are CPA or Benchmark certified, KCMA would review the spreadsheet, and based on the volume of purchases, select up to three individual monthly periods, scattered throughout the twelve-month period, for closer examination. KCMA would then request a sample copy of specific panel product related invoices for those selected periods.*
- 2. Upon receipt of the required invoices for the selected period, KCMA would examine those invoices for adequate compliance declarations by the manufacturers, dealers, distributors or fabricators in the cabinet manufacturer's supply chain.*
- 3. Failure of proof of compliance from the selected invoices will require a sampling of up to six additional periods.*

A sample spreadsheet is located at the end of this document.

Please do not include any of the following items which have no relevance to the proof of compliance: SDS sheets, any promotional, generic claims or letters written by the panel manufacturers.

Suppliers of compliant particleboard, MDF, and hardwood plywood must include compliance statements for ECC 4 or CWSS on all invoices (CWSS only for hardwood plywood). Equivalency to CPA's ECC 4 or Benchmark's CWSS certification can be demonstrated by the panel producer having certification through a certification body that has an equivalent standard in their scope of accreditation and is ISO 17065, 17020, and 17025 accredited by an agency who is an ILAC MRA signatory.

Guidebook Documents for II A & B: Please note you will need to supply a table showing the previous 4 months of PB and MDF purchases (first example below). Several of the purchases will be selected at random and the invoices for those purchases will need to be submitted. An example of an invoice that contains the required CPA ECC 4 compliance statement, see highlighted area on invoice, is the second example below. Not all PB and MDF sold in the US is CPA ECC 4 certified. Your purchasing department should contact the supplier(s) of the PB and MDF requesting that only CPA ECC 4 compliant PB and MDF be supplied.

If you can confirm 100% of the PB and MDF purchased is CPA ECC 4 compliant, you may supply a list of the panel supplier(s) and the certificate(s) from CPA's website, third example below.

<https://www.compositepanel.org/sustainability/ecc/the-eco-certified-composite-sustainability-standard.html>

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Sample spreadsheet for section II A & B

<u>Previous 4 Months Purchases of Particleboard and MDF, II. A&B</u>				
	Panel Supplier	Panel Manufacturer	PB	MDF
Jan 2021	Custom Wood Products	Roseburg	X	X
	BlueLinx	Fiberboard		X
	Temple Inland	Temple Inland	X	X
	Russell Plywood	CFP		
	Timber Products	Timber Products		
	Roseburg	Roseburg	X	
	Hardwoods International	Qufu Shengfu		
	Russell Plywood	Tafisia	X	
	International Plywood	Zhejiang De Hua (China Plywood)		
Feb 2021	Fiberboard	Fiberboard	X	X
	BlueLinx	CFP		
	Pluswood	Pluswood	X	
	Ace Distributors	Del-Tin		X
	Atlanta Supply	Florida Plywoods		
March 2021	China Plywood	Chung Plywood		
	BlueLinx	Plummer Forest Products	X	X
	Plum Creek	Plum Creek		X
	Kronospan	Kronospan		X
April 2021	Florida Plywoods	Langboard	X	
	Tafisa Canada	Tafisa Canada	X	X
	Arauco	Arauco		X
	CFP	CFP		

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Metro Hardwoods - Minneapolis
 9540 83rd Avenue North
 Maple Grove, MN 55369- US
 Phone: (763)-425-9293

Remit To: METRO HARDWOODS
 NW 7827-03
 MINNEAPOLIS, MN 55485-7827

INVOICE

[REDACTED]

Invoice Date: 04/20/20
Account: [REDACTED]
Branch: [REDACTED]
Phone: [REDACTED]
Fax: [REDACTED]
Delivery: [REDACTED]

BILL TO:
 [REDACTED]

SHIP TO:
 [REDACTED]

PO: [REDACTED]		REF:		JOB:		
ORDER DATE: 04/10/20	SALES SMCCLUNG	ORDER TYPE: WAREHOU		SHIP VIA: OURTRUCK		
SHIP DATE: 04/17/20	AGENTS MMEYER	ORDERED BY: [REDACTED]		FRT TERM: DEST		
		ENTERED BY: [REDACTED]		AUTH CHG:		
QTY ORDERED	QTY SHIPPED	UOM	ITEM/DESCRIPTION	CONVERTED QTY	PRICE/UOM	AMOUNT
60	60	SH	WHRWFP0164080000 1/2 x 49x97 DF PBC LT Raw/White L651 ## EPA TSCA Title VI & CARB & CPA ECC 4-11 Compliant (No Added Urea Formaldehyde) NAUF White Face Down Cust#: 554 SUBTOTAL	60.0000/SH	[REDACTED]	[REDACTED]
						[REDACTED]

PAYMENT TERMS:
 2% 10 ADI, NET 30
 You may deduct 21.12 if paid by 04/30/20

Balance [REDACTED]



Guidance for II I:

Provide a copy of the policy.

Guidance for II J:

Provide a copy of the policy. A tool is available at <http://checklist.cites.org/#/en> for searching wood species on the list. Referencing this tool as part of the wood purchasing policy is suggested. More information about CITES can be found at <https://www.cites.org/>

Wood Trade Compliance/Due Diligence Policy, II.I&J

Date

Company Name is a member of **KCMA** is committed to the preservation of our environment by using good environmental stewardship practices.

We make it our goal to strive to comply with all International Wood Trade Laws. It is our goal to build acceptance and ensure we do our part as a North American manufacturer of kitchen and bath cabinets we source all our wood products from sustainably managed forests.

During the sourcing of products, we evaluate each supplier to ensure they comply with all International Wood Trade Laws including but not limited to:

- EPA TSCA Title VI
- CARS ATCM 93120
- CPA ECC 4-19
- ANSI A208.1-2016
- The American Tree Farm System
- The Canadian Standards Association
- Lacy Act Compliant
- ISO 4000 Environmental Management Series
- The Pan European Forest Certification Council
- The international Tropical Timber Organization

To ensure compliance along with our supplier evaluation, all our PO's generated to our suppliers state our purchasing preference policy. We utilize www.cites.org for all our evaluations to search new and existing suppliers' utilization of restricted species.

Name
Signature
Date

III. Waste Minimization:

- A. Manufacturer has a comprehensive recycling program for process wastes in at least three of the following product categories: Cardboard, Paper, Plastic, Wood, Solvents, Metal. 10 Points.
- D. Manufacturer has a program for reclaiming any cabinets and either sending them for recycle, reuse, or repurpose. 5 Points.

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Guidance for III A:

List item recycled. Provide documentation and examples of pick-up tags to confirm quantities of materials recycled for past 12 months to include names of recycling companies, contacts and telephone numbers. Do not provide every pickup tag.

Guidebook Document for III A:

Recycling Program, III.A

Our ongoing recycling program addresses several areas:

- 1) invested in a state of the art wood burning system. By grinding all wood waste materials we have not only reduced our consumption of fossil fuels, but have reduced our costs to remove these materials. Our initial study has shown that we reduced our wood recycling removal by two 30 yard containers a month at a cost savings of \$1,000, as well as eliminating the use of community landfills. Additional investment was made to make this system more efficient, therefore decreasing our need for a backup heating system. These modifications have provided a surplus of wood scrap material (Fuel) which is being sold to local farmers, and recycled back into the eco-system.
- 2) We expanded on our efforts to help reduce our cardboard waste. Cardboard boxes received in from product purchases are reused in our shipping department for outbound shipping. A cardboard crusher was purchased to crush and bail any excess of cardboard. Excess cardboard bails are then removed and recycled on an average of every two months, compared to monthly in our previous program, saving us on our emissions.
- 3) We purchased a distilling machine to process all finish goods waste materials, reducing our need to remove these products and utilizing the distilled materials. The distilling machine removes solvents from the waste, which are used several times over to clean all of our finishing devises, such as spray guns, spray lines, and storage devises. This process has reduced our need to purchase lacquer thinner drastically every year. The byproduct of this distilling process is removed by a certified company. Cycle Chem, Inc blends this material into a fuel that is used in cement kilns.
- 4) We use reusable wipe cloths in our finishing department. The wipe cloths are used in our staining and glazing processes. During the production day, soiled cloths are put into a bag inside a lidded container. At the end of each day, the bag of soiled cloths is consolidated in to one drum. The soiled cloths are picked up every Thursday by Cintas Corporation. At time of pick up, Cintas Corporation also delivers fresh cloths to be used.
- 5) We deliver cabinet wrapped in cloth shipping blankets. By utilizing shipping pads we are not providing any additional cardboard waste to the jobsites our cabinets are being delivered to.

We recycle the following materials

- 1) Wood
- 2) Solvents
- 3) Cardboard
- 4) All metal scrap such as empty gallon cans to reduce our removal to landfills
- 6) Office paper & plastic

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In addition to the policy above, this participant supplied pick up tags from the companies recycling their products as required in the ESP Guidance Document.

Guidance for III D:

Provide a description of the program along with evidence the cabinets have been either recycled, reused, or repurposed.

Guidebook Document for III D:

Reclaiming Cabinet Policy, III.D.

Cabinets that are built but cancelled or returned by our customers are put into an area called "dead stock". Below is the procedure we follow to recycle, reuse or repurpose these cabinets.

- Cabinets are inspected to ensure that there are no damages, then logged in.
- Assembly managers compare this log to manufacturing build reports. If there is a perfect match, the deadstock cabinet is pulled, relabeled and sent to warehouse for shipping.
- After approximately 30 days, if Assembly is unable to use these cabs, they are listed for employees to purchase for reduced price.
- After approximately 2 weeks, if no employee is interested, we see if there is any need for additional cabinetry in Company offices or reach out to non-profit organizations.
- Finally, if there is no use for these cabinets, the cabinets are deconstructed and all reusable parts are put back into inventory and the rest is recycled or chipped

Cabinets that come off the production line and are deemed seconds or are returned because of defects are either 1) auctioned to employees, 2) donated to a non-profit organization or 3) deconstructed and all reusable parts are put back into inventory and the rest is recycled or chipped.

IV. Environmental Stewardship:

- B. Manufacturer reviews environmental practices and policies of its key vendors and contractors. 5 Points.
- C. Manufacturer has a documented program which promotes the use of renewable/recycled materials or products. 5 Points.

Guidance for IV B:

Provide a list of the key vendors contacted within the last 12 months for a review of their environmental policies and statements. Key vendors should include panel manufacturers, lumber, finish and hardware suppliers as well as utility companies.

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Guidebook Document for IV B: Contact can either mean reaching out to them via a phone call, email, or reviewing the environmental policies on their website.

Vendor List IV.B	
Vendor Name	Purchased Products
Arauco Panels USA	Particleboard
Georgia Pacific	Particleboard
Eagle Industries	Plywood
Hukon International	Drawer Parts
Roseburg Forest Products	Particleboard
Woodcraft Industries	Doors, Drawer Fronts and Accessories
Timber Products	Plywood
DCR CO., LTD	Plywood
EVERGREEN FIBREBOARD	Plywood
Tubao Decoration Material	Plywood
Hoyo Home Furnishings Co., Ltd.	Paper
King Slide Technology Co., Ltd.	Drawer Slides, Hinges, Brackets
Kronospan	Particleboard
Rev-A-Shelf Inc.	Accessories
Specified Components	Drawer Parts, Frame Parts, Laminated panels, Accessories
HUILING WOOD PRODUCTS CO., LTD	Plywood
Nuwood	Accessories
Burton Station	Accessories

Guidance for IV C:

Provide a copy of the program which promotes the purchase and use of renewable/recycled materials or products. Do not claim panel products here for additional points. This is for materials you consume, not materials you recycle. You also cannot claim consumption of particleboard and MDF again in this section. Examples could be returnable furniture pads to ship cabinets, recycled cardboard boxes to ship cabinets, consumption of office paper, tissues, towels, cups with recycled content, wood shipping pallets. The preference for the purchase of used or rebuilt machinery also applies in this category.

Guidebook Document for IV C:

<p><u>Purchasing Policy – Renewable or Recycled Content, IV.C</u></p> <p>It is our policy to source material with renewable or recycled content when available. The purchasing department seeks out vendors that offer these products. The following list are items we currently purchase that have renewable and/or recycled content.</p> <ol style="list-style-type: none"> 1) Office paper and other office supplies 2) Paper towels and toilet paper 3) All cardboard 4) Recycled thinner for cleaning of paint lines and equipment 5) Furniture pads for shipping

V. Community Relations:

- A. Manufacturer demonstrates community involvement and leadership through service or charitable organizations (Habitat for Humanity, Food Banks, Emergency Response Agencies, hospitals and similar organizations). 5 Points.
- B. Manufacturer has had no non-compliance citations from any Federal, state or local environmental regulatory agency in the previous 12 months exceeding \$15,000 per citation. 5 Points.

Guidance for V A:

Provide a list of projects and activities supported in the past 12 months. Provide copies of thank you letters from these organizations, press releases or awards received.

Guidebook Document for V A:

<u>Charitable Donations, V.A</u>
We have contributed to the following organizations within the past 12 months:
<ul style="list-style-type: none">1) Habitat for Humanity2) Red Cross3) Children's Hospital4) Volunteer Fire Department
Please see attached thank you letters.

Guidance for V B:

Provide a signed statement by a corporate officer (see Application signature page) attesting to the above requirement. A major citation is one resulting in a fine of \$15,000 or more.

Guidebook Document for V B: The ESP 01-24 Application contains a statement, checkbox, and signature line to be used to demonstrate compliance with this mandatory requirement. When completing the ESP 01-23 Application, make sure to have a corporate officer read the statement, check the box, and sign. See highlighted section in the document below.

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The following declarations are to be completed by an officer of the company:

- I affirm to the best of my knowledge that in the past twelve months 100% of the manufacture or purchase of particleboard, MDF and hardwood plywood comply with current CARB ATCM or TSCA Title VI limits for the respective products.
- I agree to report to KCMA within 60 days of any local, state or federal citation in excess of \$50,000 per violation explaining the circumstances of the citation and violation. Upon final determination by the regulator that the violation was willful, grossly negligent or reckless, the ESP Committee (subject to KCMA Board approval) may terminate, for a period of no less than 12 months, the ESP participant's participation in the ESP Program. The ESP participant shall have the right to a review hearing regarding such termination by a third party arbitrator following ANSI arbitration procedures. The cost of such arbitration will be borne by the ESP participant.

If claiming points in the following section, the box must be checked:

- Section V. B. I attest there have been no non-compliance citations from any Federal, state or local environmental regulatory agency in the previous 12 months exceeding \$15,000 per citation.

Signature: _____ Date: _____

Printed Name: _____