

To:  
From: Frank E. Ehrenfeld III, Laboratory Director – CP Labs  
Re: Testing Products for Lead Content as *Mandated* by CPSC  
Date:

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As a follow-up to this introduction, I've put together this brief technical bulletin that may interest you. It details recent changes in federal requirements concerning product testing for lead content.

Our analytical staff experience, facilities, instrumentation, accreditations, history of quality testing services, and our focus on the objectives of our customers - make using IATL an easy decision. We've had many professionals in your position comment that their experience with IATL has saved them countless headaches (not to mention countless dollars) down the road. Consider a proactive approach to product testing will avoid any future consequences and potential liability.

How can we help? Please take a minute to read the following information and contact us with any questions.

If you have any questions, feel free to call me or one of our Business Development Coordinators directly.

Thank you for your time,

Frank Ehrenfeld  
Laboratory Director - IATL



*"Baseline accreditation of each category of laboratory to the International Organization for Standardization ISO/IEC 17025:2005—General Requirements for the Competence of Testing and Calibration Laboratories—is required. The accreditation must be by an accreditation body that is a signatory to the International Laboratory Accreditation Cooperation—Mutual Recognition Arrangement ("ILAC-MRA") and the scope of the accreditation must include testing for lead content in metal alloy parts of products in accordance with the CPSC Standard Operating Procedure for Determining Total Lead (Pb)." www.cpsc.gov*

**About IATL:**

- CP Labs is a division of IATL. A CPSC recognized third party testing laboratory. (No. 1135)
- International Asbestos Testing Laboratories has been recognized for its environmental lead testing and other analytical lead testing services by the National Lead Laboratory Accreditation Program (NLLAP) through EPA, AIHA, and other regulatory authorities for over 15 years.
- We are ISO 17025:2005 compliant and are a registered CPSC third party laboratory.
- Our new (2007) state-of-the-art facilities offer over 12,000 square feet of administrative and laboratory space dedicated to *customer service* and *analytical quality*.
- We routinely analyze 1,000-2,000 lead samples each week with the ability to quickly triple that capacity.
- We have significant experience in analytical due diligence and carry professional liability insurance in excess of \$3M to protect our clients' interests.
- Our professionals have been recognized for their competencies as expert-witnesses.
- Our efficient analytical processes allow for industry-best pricing.
- Call us toll free and see how we can help you with your product testing. (877) 428-4285

## Product Testing for Lead Content:

### Laboratory Analytical Services Available for CPSC Requirements

**Summary:** Recent changes to the Consumer Product Safety Commission's (CPSC) program on allowable levels of lead in products have prompted new rounds of testing. As a Manufacturer (or if you are anywhere in the Supply Chain for any product sold in the United States), you are responsible for monitoring and reporting the lead content in your product. There are threshold values of allowable lead in products as well as product exemptions.

**Where Lead Might be Found in Products:** There are thousands of products that utilize lead in varying amounts. These include, but are not limited to: consumer electrical equipment (EEE), solder, printed circuit boards, PVC, wire coatings, pigments/paint, computer chips, screws, prongs, jewelry, ceramics, glazing and coatings, glass, PC CRTs, etc.

**Lead Timeline:** The CPSC has revised its allowable lead content levels as follows:

- Lead Paint: 90 ppm 08/14/2009
- Lead in other Products<sup>1</sup>: 600 ppm 02/10/2009, 1000 ppm (07/01/06) EU<sup>3</sup>/RoHS  
300 ppm 08/14/2009  
100 ppm<sup>2</sup> 08/14/2011

**Exclusions:** There are three main rules for lead content exclusions<sup>4</sup>. These include:

- Inaccessibility: This rule defines product components or classes of components considered inaccessible. There are test methods to determine inaccessibility<sup>5</sup>.
- HRA Exclusion: This is generally where the product or material that CPSC determines has no absorption of lead in the body under reasonably foreseeable use and abuse or have any other adverse impact on health or safety. Ex: products where no 'practical' substitution is possible like gemstones.
- Electronic Devices: Requirements detailing elimination or minimized accessibility.
- CP Labs can help determine if you qualify for an exclusion.

**Product Testing and Analytical Methods:** There are multiple analytical methods that are approved by the CPSC. Please call us to see what your product might require.

**Reporting Parameters:** CP Labs can supply final test reports in the form of Certificates of Analysis (units in Pb % by weight and ppm) with all supporting documentation, electronic deliverables, and narrative reports<sup>6</sup>.

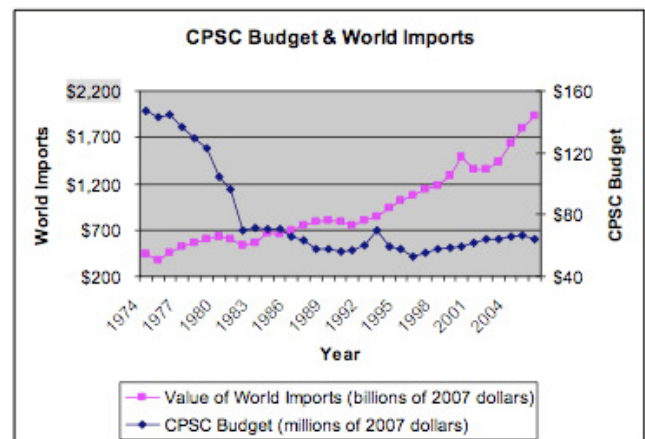
**Penalties and Enforcement:** 16 CFR 1500, Dec. 22, 1998 outlines CPSC's Final Statement and addresses penalties under the Federal Hazardous Substances Act.

#### Resources:

- CPSC website info at [www.cpsc.gov](http://www.cpsc.gov),
- TS&QI website info [www.toysafety.com](http://www.toysafety.com)
- EU RoHS info at [www.rohs.gov.uk/docs/links/RoHS](http://www.rohs.gov.uk/docs/links/RoHS)

#### References:

- 1- see Lead Content Exclusion Rules
- 2- If technologically feasible, ppm = parts per million = mg/kg
- 3- European Union RoHS Directive 2002/95/EC July I, 2006 0.1% Pb, brand owner is responsible for testing.
- 4- see also 16 CFR 1303 Lead Paint Standard and Federal Hazardous Substances Act FHSA 15 USC1261
- 5- Inaccessibility methods can be found in CPSIA 101(b)(2)(A)(a)
- 6- Narrative reports require extra process fees. Call for more information.



From: Toy Industry Assoc. 2008



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## Product Testing for Lead Content:

Laboratory Analytical Services Available for CPSC Requirements

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### Analytical Methods:

- 16 CFR Part 1303 – Lead Paint in Products
- CPSC CH E1001-08 Lead in Children’s Metal Jewelry

### Laboratory Turn Around:

- CP Labs is engineered to accommodate hundreds of these tests each week.
- Our fee structure is dependent upon requested turn around times (see below). Expedited analyses required advance notice to the laboratory. Other issues can also alter requested turn around times – such as, sample volume, complexity of the samples, moisture control, etc.
- The laboratory process calls for destructive testing. The process will destroy the product so that various components can be tested. This also means that your product will become property of CP Labs (and will be properly disposed of after one year). If you require the remnants of the product be sent back, a separate chain of custody must be supplied to the laboratory. Shipping costs for a return will be paid for by the laboratory customer.

### Limits of Quantitation:

- Since these are based upon gravimetric analyses (require initial weights of each sample) the reporting limits may vary.
- Typical Detection Limits (by Atomic Absorption Spectrophotometry – flame detection) are at 10 ppm with greater sensitivities available on select samples.
- In addition, clients may further choose to improve their detection limits by directing the laboratory to use AAS Graphite Furnace (AAS GF) which has LOQs in the ppb range. This increased sensitivity will increase analytical costs.

### Fees\*:

Turn Around Time

|          |       |       |       |        |
|----------|-------|-------|-------|--------|
| Next Day | 2 Day | 3 Day | 5 Day | 10 Day |
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\* Volume discounts may apply for large projects. Please contact the laboratory.

\*\* Please contact the laboratory for availability and fees.  
These prices do not include AAS-GF analysis.



CPSC No. 1135  
Accredited Third Party Laboratory