

Component Part Testing



April 15, 2010

These comments are those of the CPSC staff, have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission .

Topics:

Component Part Testing

- When
- By Whom
- When to Rely on Tests Conducted by Others
- Composite Testing

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Sec. 14(a) of the CPSA requires testing of all products subject to consumer product safety rules or similar rules enforced by CPSC.

Paint & Surface Coatings

16 CFR 1303



= 90 ppm

ASTM F963

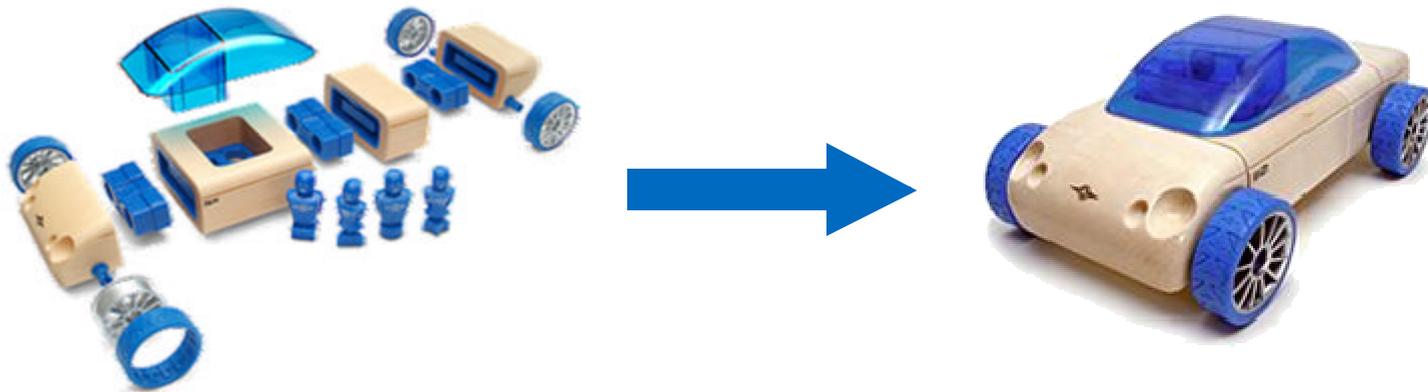


Antimony, Arsenic,
Barium, Cadmium, = 25 to 1000 ppm
Chromium, Lead,
Mercury, Selenium

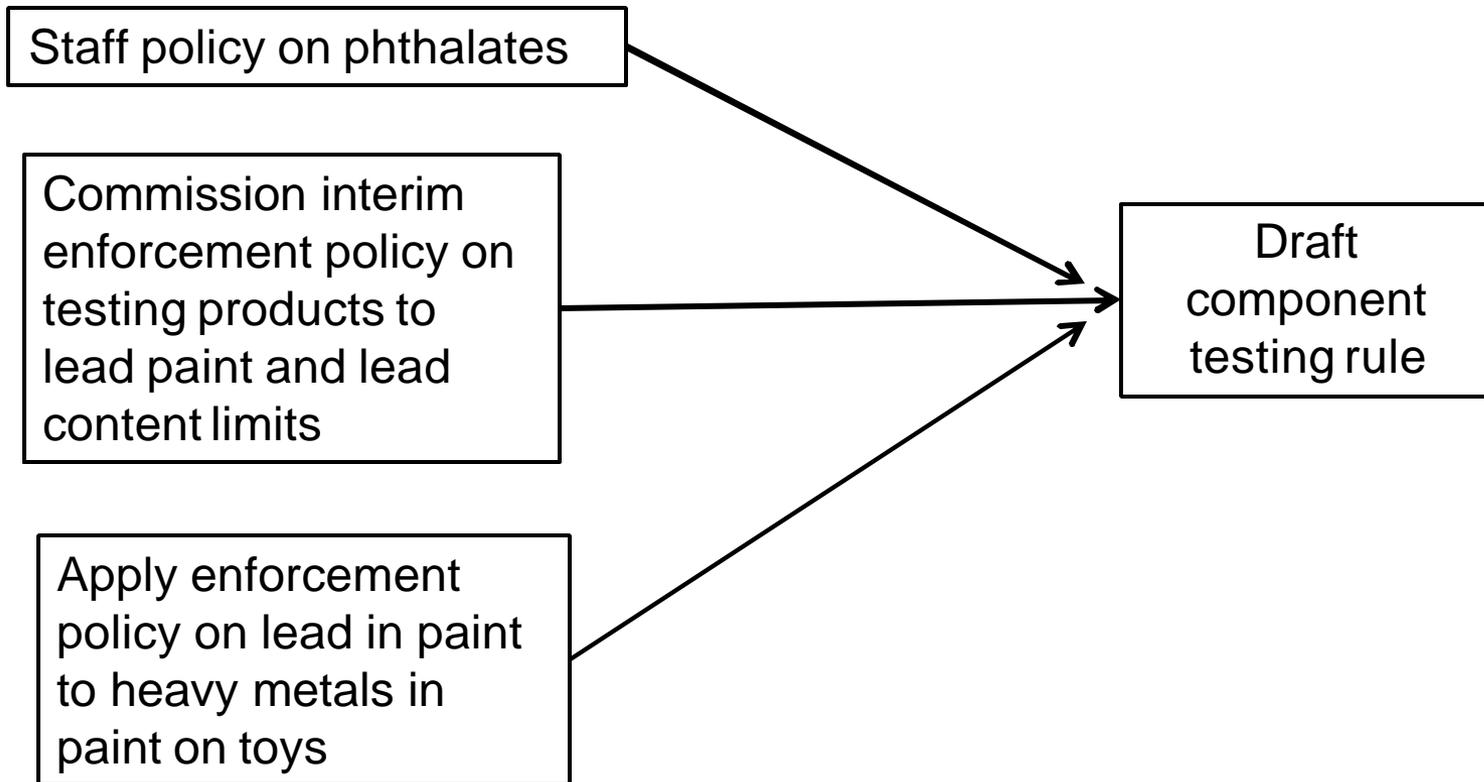
Component Part Testing

Lead in **Accessible** Component Parts

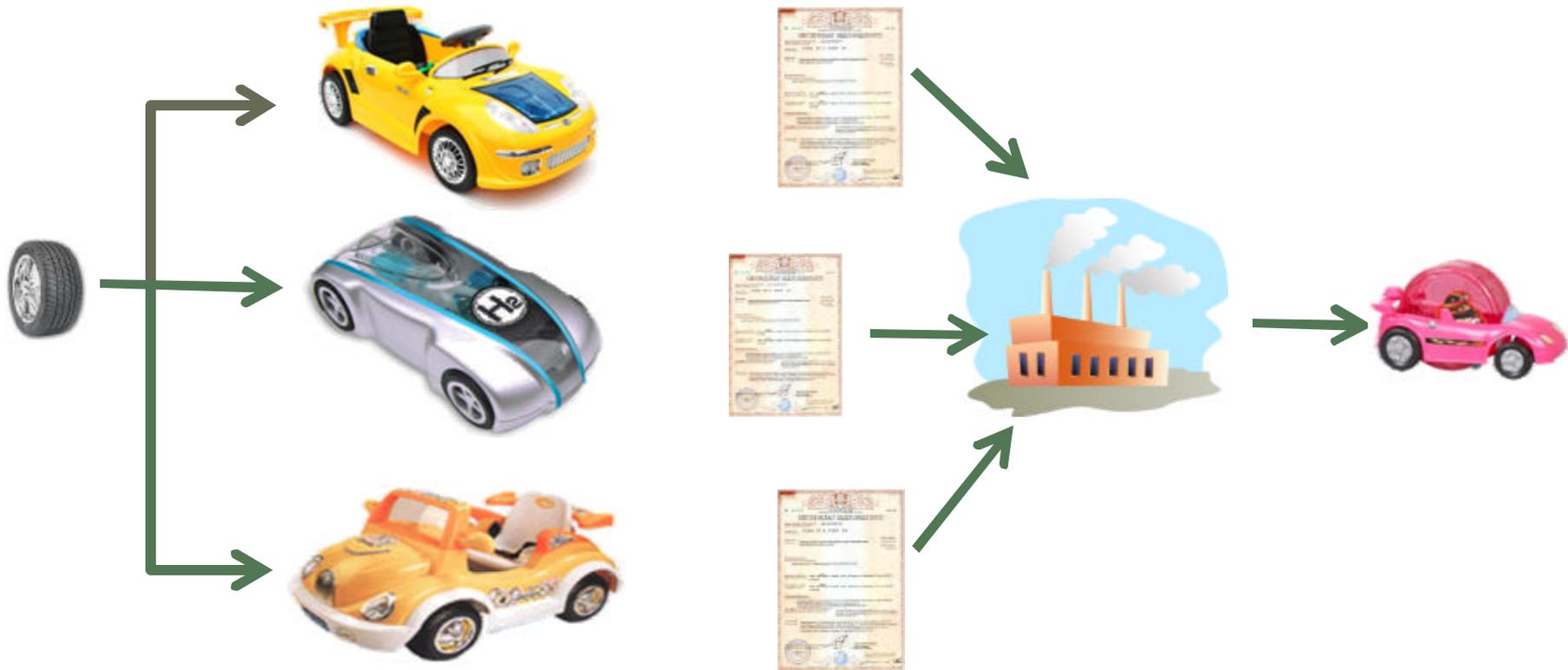
Phthalates in **any** Component Part



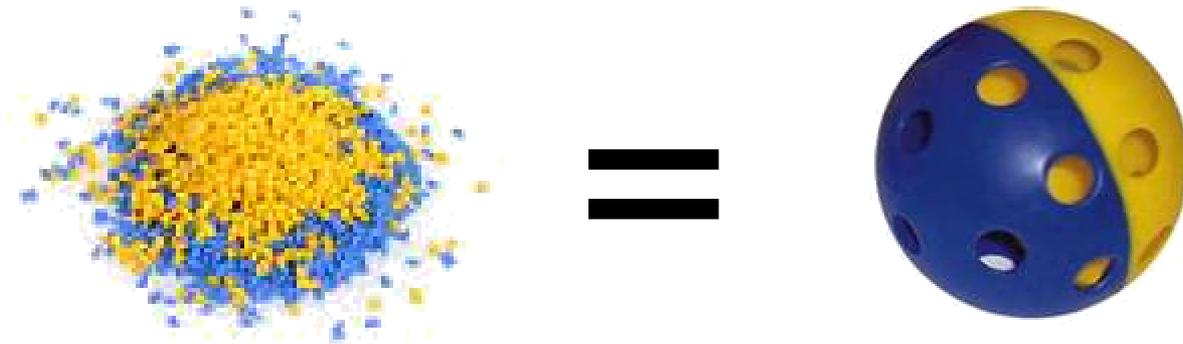
Component Part Testing



Component Part Testing

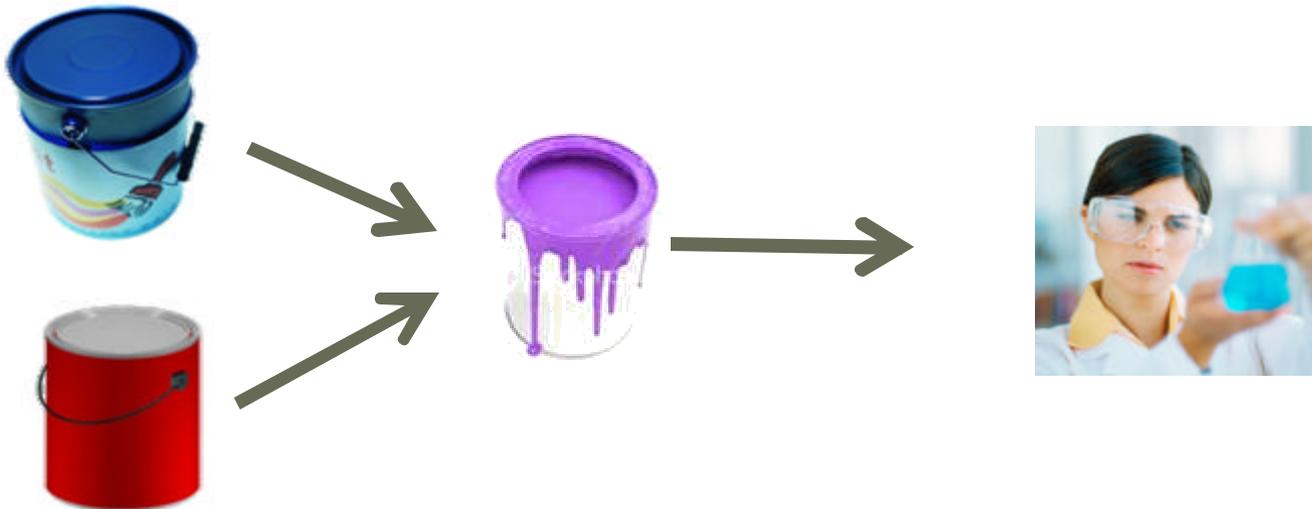


Component Part Testing



Component Part Testing

- Composite Testing of Component Parts
- Component parts are mixed, then tested.



Draft Proposed Rule

Subpart A = Scope, Purpose, Applicability, Definitions, and General Requirements

Proposed ?1109.5, General requirements

- Allowable testing of component parts
- Identical in all material respects to finished product
- Traceability of certificates from others
- Specific documentation requirements
- Certificate required information
- Retention periods

Draft Proposed Rule

Subpart B = 4 Sections

Proposed ?1109.11: Paint and other surface coatings

- All tests on dried, scraped paint
- Certificate basis can be test report from third party lab or certificate from another person based on third party lab tests
- Non-children's product certificate can be based on any party's tests

Draft Proposed Rule

Subpart B = 4 Sections

Proposed ?1109.11: Paint and other surface coatings

Proposed ?1109.12: Lead content in accessible parts

- Accessibility evaluates finished product
- Certificate basis can be test report from third party lab or certificate from another person based on third party lab tests
- Certificate must list each component part

Draft Proposed Rule

Subpart B = 4 Sections

Proposed ?1109.11: Paint and other surface coatings

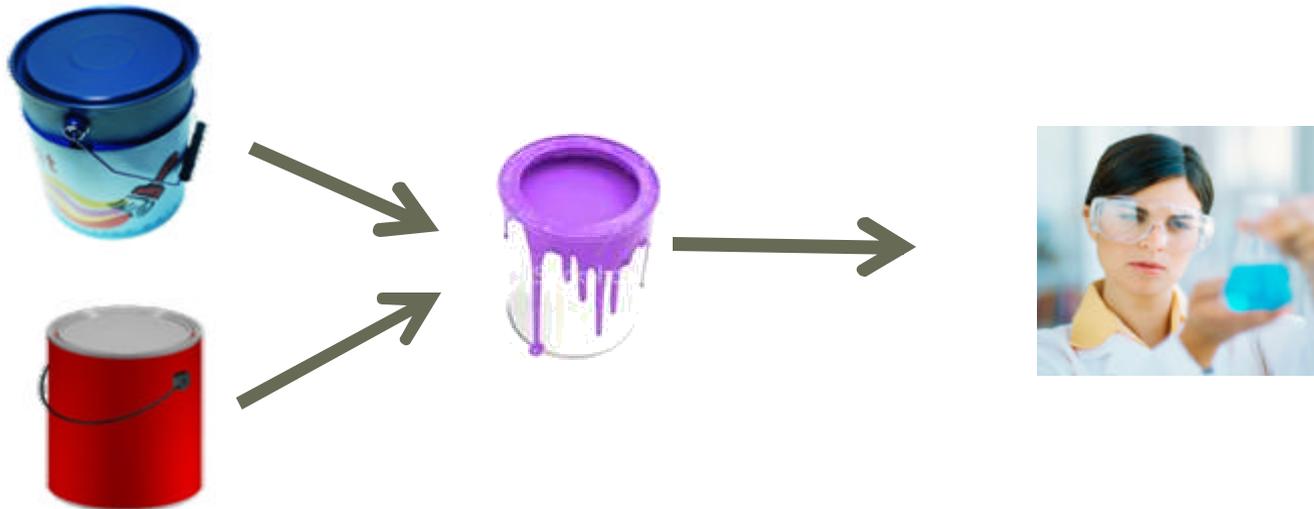
Proposed ?1109.12: Lead content in accessible parts

**Proposed ?1109.13: Phthalates in children's toys and child
care articles**

Proposed ?1109.14: Composite part testing

Composite Testing

- Component parts are mixed, then tested.
- Total is attributed to each component part.
- Must be below applicable limit.





Staff Recommendation

- **Publish Notice of Proposed Rulemaking.**
- **Set an effective date of six months after publication of the final rule, non-retroactively**

Questions?