

Report No.: 66422-100408R1

Date: Oct. 29, 2022

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**Applicant** : **NOMAN TERRY TOWEL MILLS LTD.**  
**Address** : VAWAL, MIRZAPUR, GAZIPUR-1703, BANGLADESH  
**Contact Person** : MR. SHAKIB HOSSAIN  
**Tel** : +8801776047344  
**E-mail** : [shakib.mkt@nttml.com](mailto:shakib.mkt@nttml.com)

**Sample Description** : SCRUBBER/TERRY GOLF TOWEL  
**Color** : **A. BLACK, B. NAVY, C. WHITE**  
**Item/ Style Number** : SM-5985WH, SM-5985NY, SM-5985BK, SM-5987BK, SM-5987NY, SM-5987WH, 2091-03BK2091-03NY & 2091-03WH  
**Style Description** : TERRY TOWEL  
**Purchase Order Number** : M000029523, M000029282, 1932357, 1932358 & 1932359  
**Season** : 22  
**End Use** : TOWEL  
**Fiber Composition:** : /  
**No. of Sample Received** : 9 PCS  
**Buyer** : **SELF-REFERENCE (POLYCONCEPT)**  
**Brand Name** : BULLET & LEED'S  
**Agent Name** : /  
**Manufacturer Name** : NOMAN TERRY TOWEL MILLS LTD.  
**Country of Origin** : BANGLADESH  
**Country of Destination** : USA  
**Age Grade** : /  
**Test Status** : SELECTIVE TEST (CA PRO 65 TEST)  
**Date of Submission** : Oct. 27, 2022  
**Test Performance Dates** : Oct. 27, 2022- Oct. 29, 2022  
**Revised date and reason** : NOV. 08, 2022 (PHTHALATES CONTENT TEST ADDED AS PER VENDOR REQUEST)  
**Provided Care Instruction:** : /

**Photo of Submitted Sample**

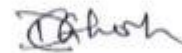


<b>TEST RESULT SUMMARY</b>		
<b>Test Requested</b>	<b>Results</b>	<b>Remarks</b>
Total Lead Content in Galvanized Metal – Client’s Request to Test According to the Reformulation Level(s) Set forth in the Consent Decrees of Similar Products (Court Case No.: San Francisco Superior Court 309177 / 313946)	PASS	
Total Lead Content in Clothing – Client’s Request to Test According to the Reformulation Level(s) Set forth in the Consent Decrees of Similar Products (Court Case No.: San Francisco Superior Court CGC-11-509211)	PASS	
Phthalates Content (CA Pro 65)	NA	
Phthalates Content – U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 108	PASS	

Note: NA = Not Applicable

**Remark: Test result and evaluation are only related to tested items and performed method. Detailed information regarding measurement uncertainties are available on request if applicable.**

For and on behalf of  
Modern Testing Services (Bangladesh) Ltd.



**Dipok Chondra Ghosh**  
General Manager

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**COMPONENT BREAKDOWN LIST:**

Test Item	Component Description
A1	Silvery metal (carabiner)
A2	Silvery metal (eyelet)
A3	Silvery metal (washer)
A4	Black fabric (towel) (larger/medium/small)
A5	Black/white coated white fabric (care label)
B1	Silvery metal (carabiner) (same as A1)
B2	Silvery metal (eyelet) (same as A2)
B3	Silvery metal (washer) (same as A3)
B4	Navy fabric (towel) (larger/medium/small)
B5	Black/white coating with white fabric (care label) (same as A5)
C1	Silvery metal (carabiner) (same as A1)
C2	Silvery metal (eyelet) (same as A2)
C3	Silvery metal (washer) (same as A3)
C4	White fabric (towel) (larger/medium/small)
C5	Black/white coating with white fabric (care label) (same as A5)

**TEST RESULT:**

**Total Lead Content in Galvanized Metal – Client’s Request to Test According to the Reformulation Level(s) Set forth in the Consent Decrees of Similar Products (Court Case No.: San Francisco Superior Court 309177 / 313946)**

Test Item	Result - Total Lead (Pb) (ppm)	Conclusion
A1+A2+A3	<10	PASS (See Remark)

Method: Sample was digested with reference to EPA 3052. The lead content was analyzed by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: Proposition 65 requires businesses to warn Californians about exposures to certain listed chemicals known to cause cancer, birth defects, or other reproductive harm. If a business exposes a Californian to a listed chemical without providing a warning, then the business may be sued for the possible violation of Proposition 65. The business will then have the burden of proving that the listed chemical in the product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

The reformulation level set forth in the Consent Decrees of similar products to the Sample is **300 ppm**. The reformulation levels set forth in the various Consent Decrees are only the binding requirements for the defendants named in the case, and by complying with the reformulation requirements, the defendants are protected from further Proposition 65 violations for the products that are covered in the case. However, the reformulation levels set forth in the various Consent Decrees are not necessarily the safe harbor limits. The reformulation levels set in the Consent Decrees are usually expressed in relative concentration levels (i.e., mg/kg, ppm) while the safe harbor limits identify a level of exposure to a listed chemical in micrograms per day. Therefore, for businesses that are not named in the Consent Decrees as defendants, complying with

the reformulation levels of Consent Decrees does not fully protect the businesses from being sued for the possible violation of Proposition 65. These businesses may still be sued for the possible violation of Proposition 65 and will have the burden of proving that the listed chemical in their products are under the safe harbor level or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

If your product contains any amount of a listed chemical, the only way to fully avoid the possibility of the burden of proving that the listed chemical in your product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm is to provide a warning about the exposures to the listed chemical known to cause cancer, birth defects, or other reproductive harm. Please consult MTS for more details regarding the different options of labeling and the mechanics of labeling.

Note: ppm = part per million  
 “<” = less than  
 “>” = more than  
 NA = Not applicable

**Total Lead Content in Clothing – Client’s Request to Test According to the Reformulation Level(s) Set forth in the Consent Decrees of Similar Products (Court Case No.: San Francisco Superior Court CGC-11-509211)**

Test Item	Result - Total Lead (Pb) (ppm)	Conclusion
A4+B4+C4	<10	PASS (See Remark)
A5	<10	PASS (See Remark)

Method: Sample was digested with reference to EPA 3052 / EPA 6010B. The lead content was analyzed by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Test Item	Result - Ghost Wipe Lead (Pb) (µg)	Conclusion
A4	<1.0	PASS (See Remark)
A5	<1.0	PASS (See Remark)
B4	<1.0	PASS (See Remark)
C4	<1.0	PASS (See Remark)

Method: With reference to NIOSH Method 9100. The lead and cadmium contents are determined by Atomic Absorption Spectrophotometer / Inductively Coupled Argon Plasma Spectrometer / Inductively Coupled Plasma Mass Spectrometer.

Remark: Proposition 65 requires businesses to warn Californians about exposures to certain listed chemicals known to cause cancer, birth defects, or other reproductive harm. If a business exposes a Californian to a listed chemical without providing a warning, then the business may be sued for the possible violation of Proposition 65. The business will then have the burden of proving that the listed chemical in the product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

The reformulation levels set forth in the Consent Decrees of similar products to the Sample are **300 ppm in EPA method / 1 µg in NIOSH Method**. The reformulation levels set forth in the various Consent Decrees are only the binding requirements for the defendants named in the case, and by complying with the reformulation requirements, the defendants are protected from further Proposition 65 violations for the

products that are covered in the case. However, the reformulation levels set forth in the various Consent Decrees are not necessarily the safe harbor limits. The reformulation levels set in the Consent Decrees are usually expressed in relative concentration levels (i.e., mg/kg, ppm) while the safe harbor limits identify a level of exposure to a listed chemical in micrograms per day. Therefore, for businesses that are not named in the Consent Decrees as defendants, complying with the reformulation levels of Consent Decrees does not fully protect the businesses from being sued for the possible violation of Proposition 65. These businesses may still be sued for the possible violation of Proposition 65 and will have the burden of proving that the listed chemical in their products are under the safe harbor level or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

If your product contains any amount of a listed chemical, the only way to fully avoid the possibility of the burden of proving that the listed chemical in your product is under the safe harbor limit or that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm is to provide a warning about the exposures to the listed chemical known to cause cancer, birth defects, or other reproductive harm. Please consult MTS for more details regarding the different options of labeling and the mechanics of labeling.

Note: ppm = part per million  
 µg = microgram  
 "<" = less than  
 ">" = more than

### **Phthalates Content – U.S. Consumer Product Safety Improvement Act of 2008 (CPSIA), Title I, Section 108**

Test Item	Result – Phthalates Content (%)	Conclusion
A5	ND	PASS
Limit	0.1	-

ND = Not detected (Laboratory Reporting Limit = 0.005% for individual)

#### ***List of Phthalates:***

Chemical Name	CAS No.	Chemical Name	CAS No.
Dibutyl phthalate (DBP)	84-74-2	Dicyclohexyl phthalate (DCHP)	84-61-7
Butyl benzyl phthalate (BBP)	85-68-7	Di-iso-nonyl phthalate (DINP)	28553-12-0
Di-2-ethylhexyl phthalate (DEHP)	117-81-7	Di-n-hexyl phthalate (DnHP/DHEXP)	84-75-3
Di-iso-butyl phthalate (DIBP)	84-69-5	Dipentyl phthalate (DPP/DPENP)	131-18-0
*Di-n-octyl phthalate (DNOP)	117-84-0	*Di-iso-decyl phthalate (DIDP)	26761-40-0

Method: The test is conducted according to the US CPSC Standard Operation Procedure for Determination of Phthalates, January 17, 2018 (CPSC-CH-C1001-09.4)

Note: % = percentage

**NOTE:**

If there is question or concern regarding the above results, please contact with Abdul Wadud Sarker via email: [wadud@mtsbd.com](mailto:wadud@mtsbd.com)

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\*\*\*End of Test Report\*\*\*