

# Test Report

No.: NGBHL25008433401

Date: Dec 19, 2025

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Client Name: TUMBL TRAK

Client Address: 5747 W ISABELLA RD, MT. PLEASANT, MI 48858, USA

Sample Description: RED PAINTED STEEL

Origin of the Product(s): CHINA

The above sample(s) and information were provided by the client.

SGS No.: NBHL2512031432SP

Sample Receiving Date: Dec 15, 2025

Testing Period: Dec 15, 2025 ~ Dec 19, 2025

Test Requested: Select test(s) as requested by the client.

Testing Performed: Follow selected test(s) as requested by client.

	Test Requirement	Conclusion
1	Part 1303, Title 16, Code of Federal Regulations, Chapter II - Consumer Products Safety Commission of U.S.A.-Lead in paint/similar surface coating material	Pass
2	CPSIA section 101(f) - Lead in paint/similar surface coating material	Pass
3	CPSIA section 101(a)(2) - Lead in accessible substrate materials	Pass
4	CONSUMER PRODUCT SAFETY COMMISSION-16 CFR Part 1307, Final Rule, amending CPSIA section 108, Prohibition on Sale of Certain Products Containing Specified Phthalates	Pass
5	US California Proposition 65 - Lead	Pass
6	US California Proposition 65 - Phthalate	Pass
7	US California Proposition 65 - Cadmium	Pass

Signed for and on behalf of  
SGS-CSTC Standards Technical Services Co., Ltd. Ningbo Branch



Hedy Hu  
Approved Signatory

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**Test Result(s):**

**Test Part Description:**

SN ID	Sample No.	SGS Sample ID	Description
SN1	A1	NGB25-0084334-0001.C001	Red coating
SN2	A2	NGB25-0084334-0001.C002	Silvery metal base

**Remarks:**

- (1) 1 mg/kg = 1 ppm = 0.0001%
- (2) MDL = Method Detection Limit
- (3) ND = Not Detected (< MDL)
- (4) "-" = Not Regulated

**Part 1303, Title 16, Code of Federal Regulations, Chapter II - Consumer Products Safety Commission of U.S.A.-Lead in paint/similar surface coating material**

**Test Method:** With reference to CPSC-CH-E1003-09.1, analysis was performed by AAS/ICP-OES.

Test Item(s)	Limit	Unit(s)	MDL	A1
Lead(Pb)	0.009	%	0.0020	ND
<b>Conclusion</b>				<b>Pass</b>

**CPSIA section 101(f) - Lead in paint/similar surface coating material**

**Test Method:** With reference to CPSC-CH-E1003-09.1, analysis was performed by AAS/ICP-OES.

Test Item(s)	Limit	Unit(s)	MDL	A1
Lead (Pb)	90	mg/kg	20	ND
<b>Conclusion</b>				<b>Pass</b>

**CPSIA section 101(a)(2) - Lead in accessible substrate materials**

**Test Method:** With reference to CPSC-CH-E1001-08.3, analysis was performed by AAS/ICP-OES.

Test Item(s)	Limit	Unit(s)	MDL	A2
Lead (Pb)	100	mg/kg	20	ND
<b>Conclusion</b>				<b>Pass</b>

**CONSUMER PRODUCT SAFETY COMMISSION-16 CFR Part 1307, Final Rule, amending CPSIA section 108, Prohibition on Sale of Certain Products Containing Specified Phthalates**

**Test Method:** With reference to CPSC-CH-C1001-09.4, analysis was performed by GC-MS.

Test Item(s)	CAS No.	Limit	Unit(s)	MDL	A1
Benzyl Butyl Phthalate (BBP)	85-68-7	1000	mg/kg	50	ND
Dibutyl Phthalate (DBP)	84-74-2	1000	mg/kg	50	ND
Dicyclohexyl Phthalates (DCHP)	84-61-7	1000	mg/kg	50	ND
Di(2-ethyl hexyl) Phthalate (DEHP)	117-81-7	1000	mg/kg	50	ND
Di-n-hexyl Phthalates (DHEXP/ DnHP)	84-75-3	1000	mg/kg	50	ND
Diisobutyl Phthalates (DIBP)	84-69-5	1000	mg/kg	50	ND



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Test Item(s)	CAS No.	Limit	Unit(s)	MDL	A1
Diisononyl Phthalate (DINP)	28553-12-0 /68515-48-0	1000	mg/kg	50	ND
Dipentyl Phthalates (DPENP)	131-18-0	1000	mg/kg	50	ND
<b>Conclusion</b>					<b>Pass</b>

## US California Proposition 65 - Lead

**Test Method:** With reference to CPSC-CH-E1001-08.3, analysis was performed by AAS/ICP-OES.

Test Item(s)	Limit	Unit(s)	MDL	A2
Lead (Pb)	100	mg/kg	20	ND
<b>Conclusion</b>				<b>Pass</b>

### Notes:

- (1) The limit is referenced to the requirement as stated in County of Marin Case No CIV 1104003.
  - (2) The reference limit applied in testing is based on particular California Proposition 65 settlements that are most similar to the tested product in the opinion of the lab. The testing in this report does not reflect a user's actual exposure to the tested chemical.
- A manufacturer or retailer that is not named in the referenced settlement is not bound by that settlement, and may choose to comply with California Proposition 65 by clearly informing the consumer of potential exposure.

**Test Method:** With reference to CPSC-CH-E1003-09.1, analysis was performed by AAS/ICP-OES.

Test Item(s)	Limit	Unit(s)	MDL	A1
Lead(Pb)	90	mg/kg	20	ND
<b>Conclusion</b>				<b>Pass</b>

### Notes:

- (1) The limit is referenced to the requirement as stated in County of Marin Case No CIV 1104003.
  - (2) The reference limit applied in testing is based on particular California Proposition 65 settlements that are most similar to the tested product in the opinion of the lab. The testing in this report does not reflect a user's actual exposure to the tested chemical.
- A manufacturer or retailer that is not named in the referenced settlement is not bound by that settlement, and may choose to comply with California Proposition 65 by clearly informing the consumer of potential exposure.

## US California Proposition 65 - Phthalate

**Test Method:** With reference to CPSC-CH-C1001-09.4, analysis was performed by GC-MS.

Test Item(s)	CAS No.	Limit	Unit(s)	MDL	A1
Dibutyl Phthalate(DBP)	84-74-2	1000	mg/kg	50	ND
Benzyl Butyl Phthalate(BBP)	85-68-7	1000	mg/kg	50	ND
Bis-(2-ethylhexyl) Phthalate(DEHP)	117-81-7	1000	mg/kg	50	ND
Diisononyl Phthalate (DINP)	28553-12-0 /68515-48-0	1000	mg/kg	50	ND
Di-n-Octyl Phthalate(DNOP)	117-84-0	1000	mg/kg	50	ND



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Test Item(s)	CAS No.	Limit	Unit(s)	MDL	A1
Diisodecyl Phthalate (DIDP)	26761-40-0 /68515-49-1	1000	mg/kg	50	ND
Di-n-Hexyl Phthalate(DnHP)	84-75-3	1000	mg/kg	50	ND
Dicyclohexyl Phthalate(DCHP)	84-61-7	1000	mg/kg	50	ND
Diisobutyl Phthalate(DIBP)	84-69-5	1000	mg/kg	50	ND
Di-n-pentyl Phthalates (DPENP)	131-18-0	1000	mg/kg	50	ND
<b>Conclusion</b>					<b>Pass</b>

**Notes:**

(1) The limit is referenced to the requirement as stated in County of San Francisco Case No. CGC-14-541130, County of Santa Clara Case No. 113CV242946 and CPSIA&16 CFR 1307.

(2) The reference limit applied in testing is based on particular California Proposition 65 settlements that are most similar to the tested product in the opinion of the lab. The testing in this report does not reflect a user's actual exposure to the tested chemical.

A manufacturer or retailer that is not named in the referenced settlement is not bound by that settlement, and may choose to comply with California Proposition 65 by clearly informing the consumer of potential exposure.

**US California Proposition 65 - Cadmium**

**Test Method:** With reference to CPSC-CH-E1003-09.1, analysis was performed by AAS/ICP-OES.

Test Item(s)	Limit	Unit(s)	MDL	A1
Cadmium(Cd)	300	mg/kg	5	ND
<b>Conclusion</b>				<b>Pass</b>

**Notes:**

(1) The limit is referenced to the requirement as stated in County of Alameda Court Case No. RG-10-514803 (Consolidated with Case No. RG 10-545680 and RG 10-545687).

(2) The reference limit applied in testing is based on particular California Proposition 65 settlements that are most similar to the tested product in the opinion of the lab. The testing in this report does not reflect a user's actual exposure to the tested chemical.

A manufacturer or retailer that is not named in the referenced settlement is not bound by that settlement, and may choose to comply with California Proposition 65 by clearly informing the consumer of potential exposure.

**Test Method:** With reference to CPSC-CH-E1001-08.3, analysis was performed by AAS/ICP-OES.

Test Item(s)	Limit	Unit(s)	MDL	A2
Cadmium(Cd)	300	mg/kg	5	ND
<b>Conclusion</b>				<b>Pass</b>

**Notes:**

(1) The limit is referenced to the requirement as stated in County of Alameda Court Case No. RG-10-514803 (Consolidated with Case No. RG 10-545680 and RG 10-545687).

(2) The reference limit applied in testing is based on particular California Proposition 65 settlements that are most similar to the tested product in the opinion of the lab. The testing in this report does not reflect a user's actual exposure to the tested chemical.



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A manufacturer or retailer that is not named in the referenced settlement is not bound by that settlement, and may choose to comply with California Proposition 65 by clearly informing the consumer of potential exposure.

Unless otherwise stated, the decision rule for conformity reporting is based on Binary Statement for Simple Acceptance Rule ( $w=0$ ) stated in ILAC-G8:09/2019.



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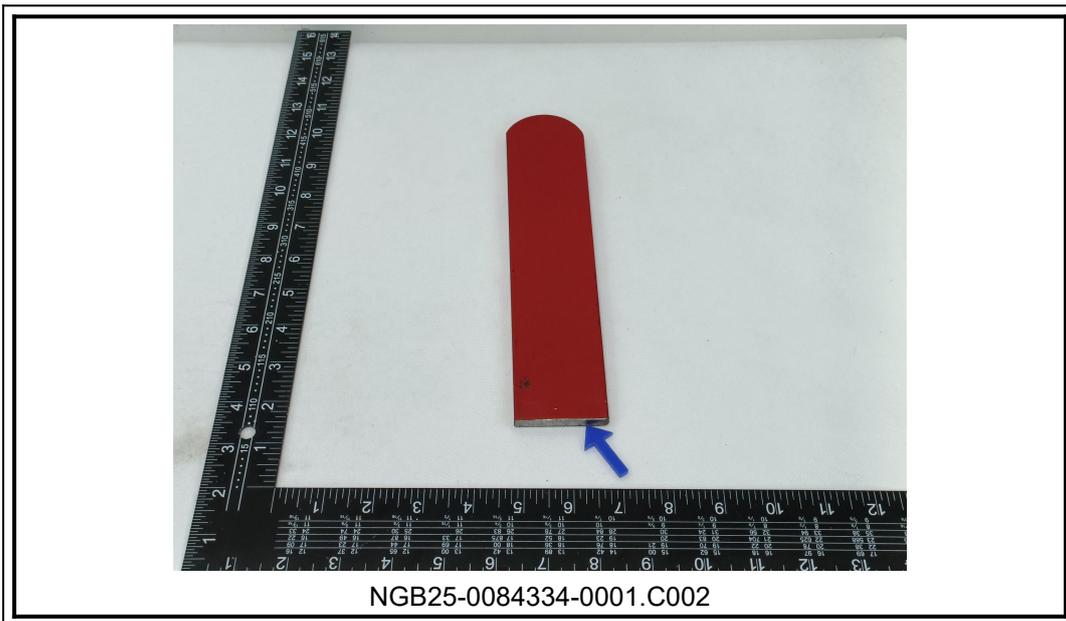
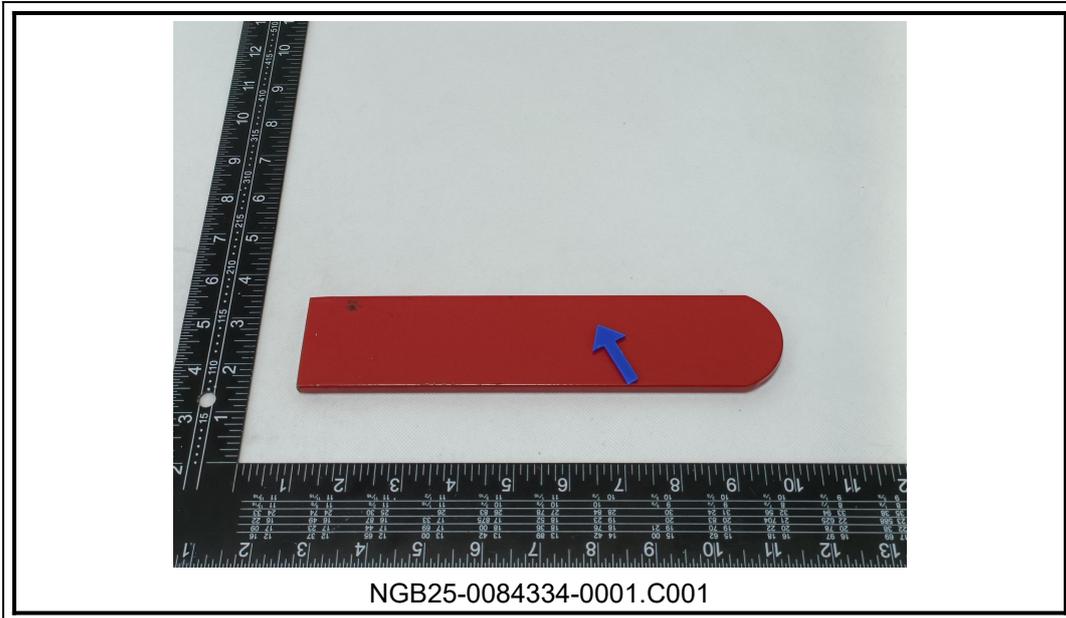
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### Sample Photo:



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

