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Direct: (763) 405-0573
Fax: (763)405-7919
Email: jennifer.yelle@target.com

October 4, 2007

Contain NO CBI

Via Certified Mail

Document Processing Center (7407M)
TSCA 8(e) Coordinator
Office of Pollution Prevention and Toxics
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-001



Re: Notice Regarding Recall of Certain Products Containing Lead
(CAS# 7439-92-1)

Dear TSCA Section 8(e) Coordinator:

Target Corporation ("Target") is filing this Notice to inform the U.S. Environmental Protection Agency ("EPA") of information concerning certain recalled products which Target has learned contain lead (Pb, CAS Registry Number 7439-92-1) at levels previously unknown to Target and which are in excess of certain standards established by the U. S. Consumer Product Safety Commission ("CPSC").

This Notice relates to the David Kirk Happy Giddy Gardening Tools and Sunny Patch Chairs identified in the enclosed press release issued by the CPSC. Enclosed with this Notice is testing data in Target's possession pertinent to the lead content found in the David Kirk Happy Giddy Trowel and Sunny Patch Chairs distributed in the U.S. and identified in the enclosed CPSC press release.

This Notice and the enclosed press release and data are consistent with information previously submitted to the CPSC by Target. The information concerning the presence of lead in these products is known to EPA on the basis of the announcements in the media, including the press release enclosed.



7000 Target Parkway North, NCD-0404, Brooklyn Park, MN 55445

Document #: 611016 Version:v1

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TSCA Section 8(e) Coordinator

October 4, 2007

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Target is submitting this Notice and the enclosures voluntarily because EPA has expressed an interest in receiving such information; however, Target has not concluded that the information provided reasonably supports the conclusion that the substances or products discussed present a substantial risk of injury to health or the environment.

If you have questions concerning this Notice and the enclosures, please contact me directly by telephone at (763)405-0573 or by e-mail at jennifer.yelle@target.com.

Sincerely,



Jennifer S. Yelle
Sr. Manager, Product Safety

Enclosures

NEWS from CPSC

U.S. Consumer Product Safety Commission

Office of Information and Public Affairs

Washington, DC 20207

FOR IMMEDIATE RELEASE

September 26, 2007

Release #07-309

Firm's Recall Hotline: (800) 440-0680

CPSC Recall Hotline: (800) 638-2772

CPSC Media Contact: (301) 504-7908

Target Recalls Children's Toy Gardening Tools and Chairs Due to Violation of Lead Paint Standard

WASHINGTON, D.C. - The U.S. Consumer Product Safety Commission, in cooperation with the firm named below, today announced a voluntary recall of the following consumer product. Consumers should stop using recalled products immediately unless otherwise instructed.

Name of Product: Happy Giddy Gardening Tools and Children's Sunny Patch Chairs

Units: About 350,000

Importer: Target, of Minneapolis, Minn.

Manufacturer: Starite International Ltd., of Taiwan

Hazard: The surface paint on the recalled gardening tools and chairs contains excessive levels of lead, violating the federal lead paint standard.

Incidents/Injuries: None reported.

Description: The recall includes the Happy Giddy Gardening Tools and the Sunny Patch Children's Chairs.

Gardening tools: caterpillar trowel with an orange and multi-colored handle; kitty cat broom with pink flowers and green handle; pink and green cultivator with a solid green tool portion and pink flowers on the handle; orange and green wood handle hoe and rake with orange flowers; pink and green shovel and trowel with pink flowers; green, orange and light blue snail push broom; multi-colored trowel, hoe, rake with orange on the tool body; multi-colored shovel with solid red on the shovel and eyes on the top of the handle; red and blue owl shaped broom with bristles painted blue, with yellow and black large eyes on the face.

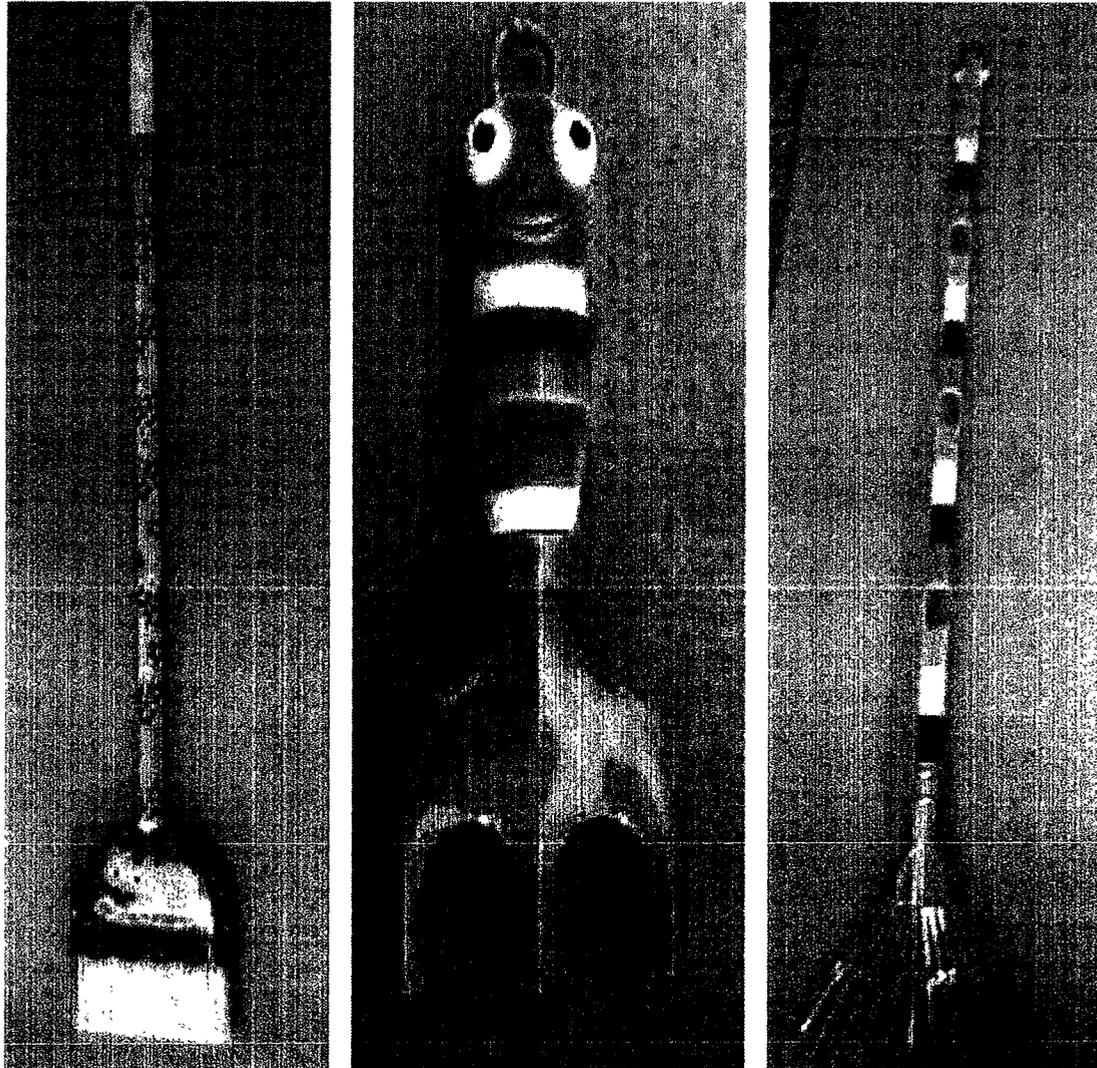
Children's Chairs: multi-colored children's Sunny Patch chairs with a giraffe, monkey, and elephant on the back. The cloth seat and back are striped in orange, yellow, green and blue. The chameleon, butterfly and lady bug chair are not included in the recall.

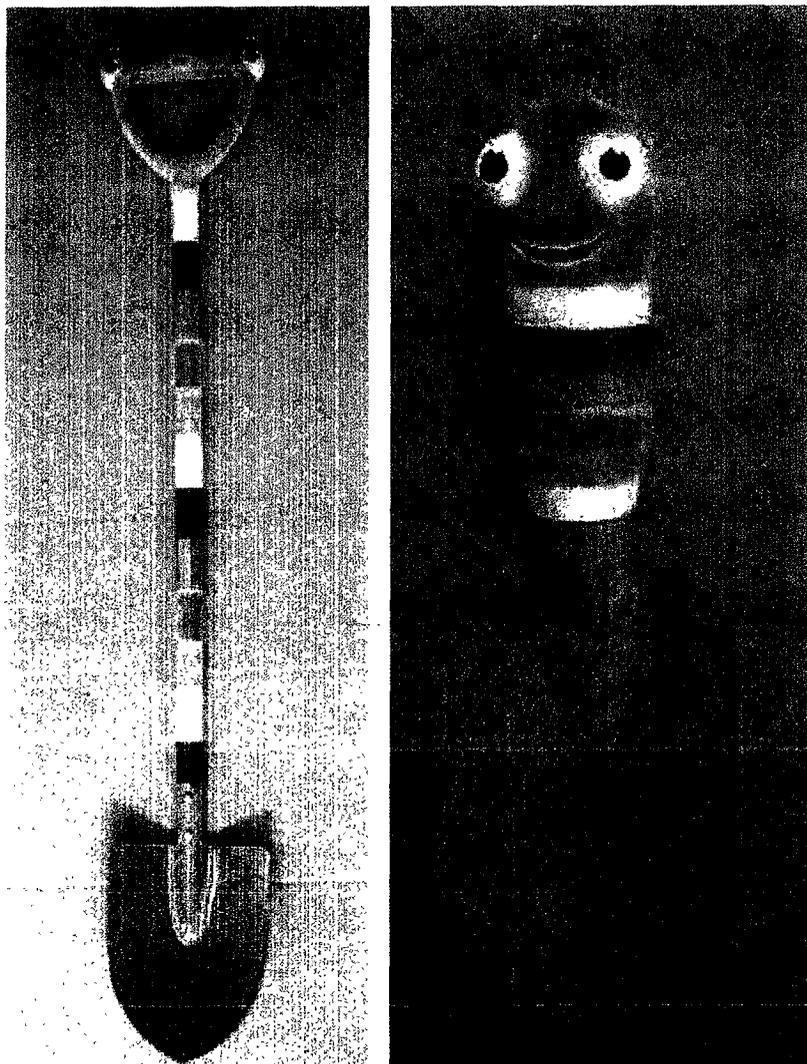
Sold at: Target stores nationwide from August 2006 through August 2007 for between \$3 and \$10.

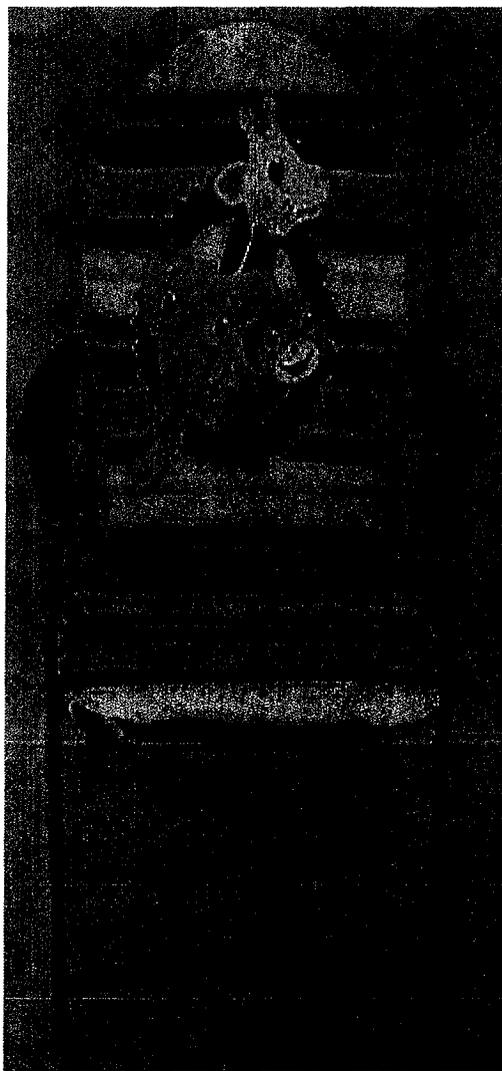
Manufactured in: China

Remedy: Consumers should immediately take the products away from children and return the item to the nearest Target store for a full refund.

Consumer Contact: For additional information, contact Target at (800) 440-0680 between 7 a.m. and 6 pm. CT Monday through Friday, or visit the firm's Web site at www.target.com







Send the link for this page to a friend! The U.S. Consumer Product Safety Commission is charged with protecting the public from unreasonable risks of serious injury or death from more than 15,000 types of consumer products under the agency's jurisdiction. Deaths, injuries and property damage from consumer product incidents cost the nation more than \$700 billion annually. The CPSC is committed to protecting consumers and families from products that pose a fire, electrical, chemical, or mechanical hazard or can injure children. The CPSC's work to ensure the safety of consumer products - such as toys, cribs, power tools, cigarette lighters, and household chemicals - contributed significantly to the 30 percent decline in the rate of deaths and injuries associated with consumer products over the past 30 years.

To report a dangerous product or a product-related injury, call CPSC's hotline at (800) 638-2772 or CPSC's teletypewriter at (800) 638-8270, or visit CPSC's web site at www.cpsc.gov/talk.html. To join a CPSC email subscription list, please go to www.cpsc.gov/cpsclist.aspx. Consumers can obtain this release and recall information at CPSC's Web site at www.cpsc.gov.

09/10/2007 09:32 3015040359



U.S. CONSUMER PRODUCT SAFETY COMMISSION

Washington, D.C. 20207

FAX

Office of Compliance
Recalls and Compliance Division
Ph: 301.504.7913
Fax: 301.504.0359

To: Jennifer Yelle From: Len Willis
Fax: (763) 405-0605 Pages + Cover: 5
Phone: _____ Date: _____
Re: _____ CC: _____

Facsimile Transmission Only Confirmation by U.S. Mail

Comments:

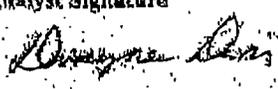
DPCI' 078/11/0650
Eli Townsend, Sr. BA
x 68833

Note: If all pages are not received, or if you have problems with this transmittal, please contact the person above.

This message is intended for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the U.S. Postal Service. Thank you.

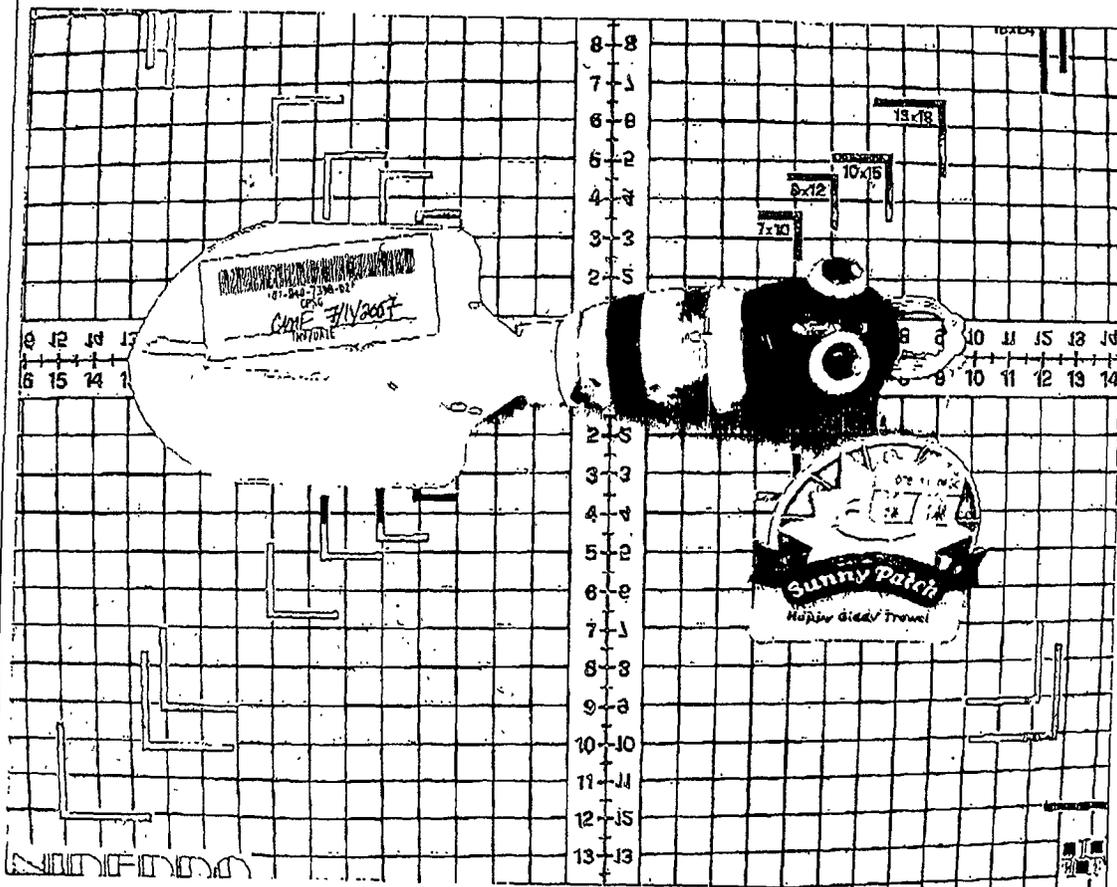
Laboratory Report		Product: Gardening Toy	1. Sample Number: 07-840-7398									
2. Seals: CPSC seal intact		3. Date Received: 07/18/07	5. Laboratory:									
6. Sample Description: One sample was received in a sealed plastic bag, placed in a large box.												
7. Labeling:		8. Custom Entry #	9. Lot/Model #									
9. Product Description: This product consists of a children's toy gardening trowel. The trowel blade is painted bright orange with a multi-colored handle. The handle is shaped as the body and face of a caterpillar. Target Corp., Minneapolis, MN.												
10. Analytical Results: The amount of lead in the sample paint was determined using the Association of Official Analytical Chemists (AOAC) method 974.02, lead analyses of paint. The results were as follows:												
<table border="1"> <thead> <tr> <th>Sample</th> <th>Description</th> <th>Total Lead % Pb (wt/wt)</th> </tr> </thead> <tbody> <tr> <td>7398-02</td> <td>trowel blade orange paint</td> <td>0.75850</td> </tr> <tr> <td>7398-05</td> <td>trowel blade orange paint</td> <td>0.8480</td> </tr> </tbody> </table>				Sample	Description	Total Lead % Pb (wt/wt)	7398-02	trowel blade orange paint	0.75850	7398-05	trowel blade orange paint	0.8480
Sample	Description	Total Lead % Pb (wt/wt)										
7398-02	trowel blade orange paint	0.75850										
7398-05	trowel blade orange paint	0.8480										
<i>found excessive levels of lead</i>												
12. Reserve Sample: Two partially consumed samples and five unused were returned to sample storage.												
13. Analyst Signature: <i>Ameyna Davis</i>		Date: 07/27/2007										
14. Check Analyst Signature:		Date:										
15. Report Checked by: <i>Jed Reith</i>		Date: 8/6/2007										

U.S. CPSC Laboratory Report

Laboratory Continuation	Sample Number: 07-840-7398																				
<p>1. <u>Lead in Paint</u> – Approximately 20 to 30 milligrams of paint were removed from sub-samples 07-840-7398-02 and 07-840-7398-05 using a disposable blade knife. The sample paint was then digested with concentrated nitric acid as described in the Association of Official Analytical Chemists (AOAC) method 974.02 for lead in paint. Following sample preparation the resulting solution was examined for lead using a Varian Inductively Coupled Plasma (ICP) spectrometer. The following instruments parameters were used:</p> <p>Plasma flow – 15 L/min Auxiliary gas flow – 1.5 L/min Nebulizer flow – 0.75 L/min Sample pump rate – 1.5 rpm Pb Wavelength – 220.353 Power – 1.2 kW.</p> <p>A calibration curve was obtained by examining standards of known concentration prepared by dilution of certified Fisher Scientific Lead Reference Solution, 1000ppm Pb ± 1%, expiration March 2008. The paint sample results were as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">Sample</th> <th style="text-align: center;">Sample wt. (mg)</th> <th style="text-align: center;">Lead, ppm (result)</th> <th style="text-align: center;">Dil Factor</th> <th style="text-align: center;">% Lead</th> </tr> </thead> <tbody> <tr> <td>7398-02 trowel blade orange paint</td> <td style="text-align: center;">29.7</td> <td style="text-align: center;">4.48788</td> <td style="text-align: center;">50</td> <td style="text-align: center;">0.75860</td> </tr> <tr> <td>7398-05 trowel blade orange paint</td> <td style="text-align: center;">29.8</td> <td style="text-align: center;">3.04901</td> <td style="text-align: center;">50</td> <td style="text-align: center;">0.6460</td> </tr> <tr> <td>NIST-11.87% (Standard)</td> <td style="text-align: center;">16.7</td> <td style="text-align: center;">2.64024</td> <td style="text-align: center;">750</td> <td style="text-align: center;">11.86*</td> </tr> </tbody> </table> <p>* Standard results within 0.11% error.</p>		Sample	Sample wt. (mg)	Lead, ppm (result)	Dil Factor	% Lead	7398-02 trowel blade orange paint	29.7	4.48788	50	0.75860	7398-05 trowel blade orange paint	29.8	3.04901	50	0.6460	NIST-11.87% (Standard)	16.7	2.64024	750	11.86*
Sample	Sample wt. (mg)	Lead, ppm (result)	Dil Factor	% Lead																	
7398-02 trowel blade orange paint	29.7	4.48788	50	0.75860																	
7398-05 trowel blade orange paint	29.8	3.04901	50	0.6460																	
NIST-11.87% (Standard)	16.7	2.64024	750	11.86*																	
Analyst Signature 	Date: 07/27/2007																				

Laboratory Continuation

Sample Number:
07-840-7398



Analyst Signature

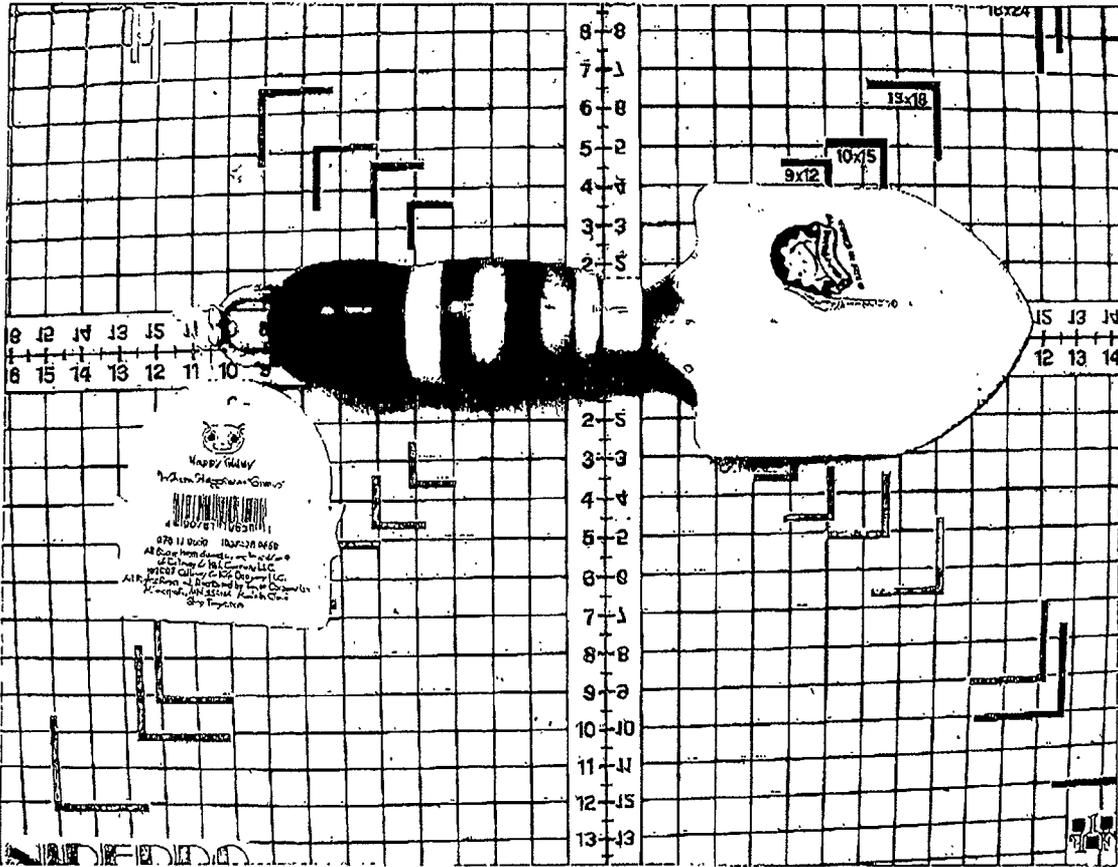
Dwayne Davis

Date:

07/27/2007

Laboratory Continuation

Sample Number:
07-840-7398



Analyst Signature

Wayne Davis

Date:

07/27/2007



TARGET CORPORATION

Test Report

Bureau Veritas Consumer Products Services, Inc.

TEST REQUESTED: 16 CFR 1303 LEAD CONTENT AND ASTM F963-07 HEAVY METALS CONTENT

Overall Rating	Unsatisfactory	Page 2 of 9
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Report Information

Lab Report Number	(5107)235-0039
Previous Report Numbers	N/A
Target Test Protocol	N/A
Lab Identification	Buffalo
Date In	August 23, 2007
Date Out	August 28, 2007
Turn Around Time	3 Days
Revision or Amendment	N/A

Sample Information

Product Description	Various
Program/Brand Name	Not Listed
Style Number	Not Listed
Colors	Not Listed
Dye Type (if applicable)	Not Listed
No. samples needed for report	28
DPCI Full Testing	N/A
DPCI Partial Testing	N/A
DPCI Assortment/Grouped	078/11/1036, 1037, 1038, 1039, 1066, 1067, 1087, 1088, 1001, 1027, 1089, 1099 and 1109
Department	078
Submission Number (if applicable)	Not Listed
TCPS Seal Tag Number (if provided)	Not Listed
P-spec number (if applicable)	Not Listed
Target Company	Target
Manufacturer/Vendor	Starite
Vendor ID Number	1028188
Vendor Email Address	Wesley.frank@target.com, john.quinn@target.com, jill.miyamoto@target.com
Vendor Phone Number	763-405-0515
BPM Factory Name	Not Listed
BPM Factory Group ID Number	Not Listed
Country of Origin	China
Buyer	
E-mail Subject Line	N/A

Fiber Content and Care Instructions (if applicable)

Labeled Fiber Content	NA
Actual Fiber Content	NA
Recommended Fiber Content	NA
Vendor Care Instructions:	
Request Form	NA
Label	NA
Lab Verified Care	NA

**Other Information (For Footwear Only)**

Product Type	Pre-production, Production after 3 months, Production over 100,000 pairs, Production sample for special quality check
Material Identity Label	
Material Type & Finishing	
Upper	NA
Lining	NA
Sock	NA
Outsole	NA

EXECUTIVE SUMMARY

The sample is rated **Unsatisfactory** for the following specifications:

The requirements of 16 CFR 1303, "Ban Of Lead-Containing Paint And Certain Consumer Products Bearing Lead-Containing Paint."

This requirement states that paint and similar surface-coating materials for consumer use shall not have a lead content greater than 0.06 percent of the weight of the total nonvolatile content of the paint or the weight of the dried paint film.

1. The sample(s) did not comply with the required limit. See data table.

The requirements of ASTM F963-07, Section 4.3.5.2, Surface Coatings.

The surface coating(s) on the sample(s) are required to be no greater than the limits specified in ASTM F963-07.

2. The sample did not comply with the specified limits. See data table.

REMARKS

Note: The received sample(s) contained scrapable surface coating material(s) of less than 10 milligrams by weight on one single sample, therefore such coating material(s) was not subject to the soluble heavy metals analysis of ASTM F963-07, "Standard consumer safety specification on toy safety", Section 4.3.5.2, as specified in Section 8.3.3.1(2).

Note: According to the excel listing provided, the samples for 78/11/1066 (Blossom Bright TM Cultivator) & 78/11/1067 (Blossom Bright TM Trowel) do not match exactly. According to the listing, they are to have polka-dots on the metal sections, however, the samples that were received by the lab are solid green.



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NOTE: It is the vendor's responsibility to correct and retest all unsatisfactory properties per Target Corporation's Partners On Line, www.partneronline.com. If there are multiple failures on a report any overrides must be requested and approved prior to resubmission or all the failures will be retested at the vendor's expense. For override requests, questions or concerns please email the appropriate address below.

Target Company/Department	Contact	Email
Target & Target.com Hardlines	General testing questions	Hardlines.Reports@us.bureauveritas.com
Target & Target.com – Departments 03, 07, 08, 12, 49, 56, 57, 58, 59, 69, 80, 82, 86, 87, 88, 91, 94, 201, 204, 207, 208, 233, 237, 245, 253	Override requests	QAHardlinesA@target.com
Target & Target.com – Departments 02, 51, 53, 54, 65, 70, 72, 74, 81, 97, 200, 234, 236, 240, 249	Override requests	QAHardlinesB@target.com
Target & Target.com – Departments 09, 55, 71, 78, 83, 84, 85, 92, 203, 212, 213, 231, 261, 284, 288	Override requests	QAHardlinesC@target.com
Target & Target.com – Departments 60, 62, 64, 66, 67, 68	Override requests	QASofthome@target.com
Target & Target.com – Departments 37, 52, 63	Override requests	QACosmetics@target.com
Target & Target.com Softlines	General testing questions	Target.Reports@us.bureauveritas.com
Target & Target.com Softlines	Override Requests	QASoftlinesOverride@target.com

Bureau Veritas
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/gf



RESULTS:

TOTAL LEAD CONTENT (16 CFR 1303, "Ban of Lead-containing paint and certain consumer products bearing Lead-containing paint")

Element:				Lead	
Requirement: Maximum allowable limit (0.06% by weight)				600 mg/kg	
Sample Description			Result (mg/kg)	Conclusion	
Color / Component	Location	Style			
(A)	Blue surface coating	Chair frame	Verdie chameleon	LT 10	Pass
(B)	Orange surface coating	Chair frame	Sunny patch safari	21,000	Fail
(C)	Lime green surface coating	Chair frame	Bella butterfly	56	Pass
(D)	Lime green surface coating	Chair frame	Bollie	50	Pass
(E)	Lime green surface coating	Chair frame	Blossom bright	67	Pass
(F)	Orange surface coating	Rake	Saffron giraffe rake	38	Pass
(G)	Composite of light blue and orange surface coatings	Handle	Saffron giraffe rake	LT 30	Pass
(J)	Composite of black, white and red surface coatings	Handle	Saffron giraffe rake	LT 30	Pass
(N)	Orange surface coating	Blade	Saffron giraffe shovel	LT 7	Pass
(O)	Composite of black, blue, white and orange surface coatings	Handle	Saffron giraffe shovel	LT 20	Pass
(T)	Composite of brown, blue, black and white surface coatings	Face	Mostly monkey broom	LT 6	Pass
(Y)	Composite of cream, red and dark red surface coatings	Face	Mostly monkey broom	LT 6	Pass
(CC)	Orange surface coating	Blade	Saffron giraffe cultivator	13	Pass
(DD)	Composite of orange and brown surface coatings	Face & handle	Saffron giraffe cultivator	LT 30	Pass
(GG)	Composite of red, white, black and blue surface coatings	Face	Saffron giraffe cultivator	LT 30	Pass
(LL)	Green surface coating	Claw	Blossom bright cultivator	10	Pass
(NN)	Composite of green, yellow, dark pink and red surface coatings	Handle	Blossom bright cultivator	LT 20	Pass
(SS)	Lime green surface coating	Blade	Blossom bright cultivator	LT 7	Pass
(TT)	Lime green surface coating	Rake	Blossom bright shovel	LT 7	Pass

LT = Less than

mg/kg = milligrams per kilogram (ppm = parts per million)

* = Average of duplicate analyses



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RESULTS:

SOLUBLE HEAVY METALS CONTENT (ASTM F963-07, Section 4.3.5.2)

Color / Component	Location	Style
A. Blue surface coating	Chair frame	Verdie chameleon
B. Orange surface coating	Chair frame	Sunny patch safari
C. Lime green surface coating	Chair frame	Bella butterfly
D. Lime green surface coating	Chair frame	Bollie
E. Lime green surface coating	Chair frame	Blossom bright
F. Orange surface coating	Rake	Saffron giraffe rake
H. Light blue surface coating	Handle	Saffron giraffe rake
I. Orange surface coating	Handle	Saffron giraffe rake
K. Black surface coating	Handle	Saffron giraffe rake
L. White surface coating	Handle	Saffron giraffe rake
M. Red surface coating	Handle	Saffron giraffe rake
N. Orange surface coating	Blade	Saffron giraffe shovel
P. Black surface coating	Handle	Saffron giraffe shovel
Q. Blue surface coating	Handle	Saffron giraffe shovel
R. White surface coating	Handle	Saffron giraffe shovel
S. Orange surface coating	Handle	Saffron giraffe shovel
U. Brown surface coating	Face	Mostly monkey broom
V. Blue surface coating	Face	Mostly monkey broom
W. Black surface coating with blue undercoat	Face	Mostly monkey broom
X. White surface coating	Face	Mostly monkey broom
Z. Cream surface coating	Face	Mostly monkey broom
AA. Red surface coating	Face	Mostly monkey broom
BB. Dark red surface coating	Face	Mostly monkey broom
CC. Orange surface coating	Blade	Saffron giraffe cultivator
EE. Orange surface coating	Face	Saffron giraffe cultivator
FF. Brown surface coating	Handle	Saffron giraffe cultivator
HH. Red surface coating	Face	Saffron giraffe cultivator
II. White surface coating	Face	Saffron giraffe cultivator
JJ. Black surface coating	Face	Saffron giraffe cultivator
KK. Blue surface coating	Face	Saffron giraffe cultivator
MM. Green surface coating	Claw	Blossom bright cultivator
OO. Green surface coating	Handle	Blossom bright cultivator
PP. Yellow surface coating	Handle	Blossom bright cultivator
QQ. Dark pink surface coating	Handle	Blossom bright cultivator
RR. Red surface coating	Handle	Blossom bright cultivator
SS. Lime green surface coating	Blade	Blossom bright shovel
TT. Lime green surface coating	Rake	Blossom bright shovel



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SOLUBLE HEAVY METALS CONTENT (ASTM F963-07, Section 4.3.5.2) *continued*

Element	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Mass of trace Amount	Conclusion
Maximum Limit (mg/kg)	25	1000	75	60	60	90	60	500		
Analytical Correction	60%	30%	30%	30%	50%	30%	60%	60%		
Sample	Result (mg/kg)								(gram)	Conclusion
A.	LT 15	410	LT 3	LT 3	LT 13	23	LT 8	LT 15	-	Pass
B.	LT 14	390	LT 2	260 CR	LT 12	1,300 CR	LT 7	LT 14	-	Fail
C.	LT 15	400	LT 3	LT 3	LT 13	LT 8	LT 8	LT 15	-	Pass
D.	LT 14	380	LT 2	LT 2	LT 11	LT 7	LT 7	LT 14	-	Pass
E.	LT 14	380	LT 2	LT 2	LT 12	LT 7	LT 7	LT 14	-	Pass
F.	LT 14	490	LT 2	LT 2	LT 11	LT 7	LT 7	LT 14	-	Pass
H.	-	-	-	-	-	-	-	-	-	-
I.	-	-	-	-	-	-	-	-	-	-
K.	-	-	-	-	-	-	-	-	-	-
L.	-	-	-	-	-	-	-	-	-	-
M.	-	-	-	-	-	-	-	-	-	-
N.	LT 14	490	LT 2	LT 2	LT 12	LT 7	LT 7	LT 14	-	Pass
P.	-	-	-	-	-	-	-	-	-	-
Q.	-	-	-	-	-	-	-	-	-	-
R.	-	-	-	-	-	-	-	-	-	-
S.	-	-	-	-	-	-	-	-	-	-
U.	-	-	-	-	-	-	-	-	-	-
V.	LT 6	21	LT 1	1	LT 5	LT 3	LT 3	LT 6	0.0355	Pass
W.	-	-	-	-	-	-	-	-	-	-
X.	-	-	-	-	-	-	-	-	-	-
Z.	LT 15	37	LT 3	17	LT 13	LT 8	LT 8	LT 15	-	Pass
AA.	-	-	-	-	-	-	-	-	-	-
BB.	-	-	-	-	-	-	-	-	-	-
CC.	LT 14	480	LT 2	LT 2	LT 11	8	LT 7	LT 14	-	Pass
EE.	-	-	-	-	-	-	-	-	-	-
FF.	LT 6	390	LT 1	1	LT 5	LT 3	LT 3	LT 6	0.0199	Pass



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VERITAS**

SOLUBLE HEAVY METALS CONTENT (ASTM F963-07, Section 4.3.5.2) continued

Element	As	Ba	Cd	Cr	Hg	Pb	Sb	Se	Mass of trace Amount	
Maximum Limit (mg/kg)	25	1000	75	60	60	90	60	500		
Analytical Correction	60%	30%	30%	30%	50%	30%	60%	60%		
Sample	Result (mg/kg)								(gram)	Conclusion
HH	-	-	-	-	-	-	-	-	-	-
II.	-	-	-	-	-	-	-	-	-	-
JJ.	-	-	-	-	-	-	-	-	-	-
KK.	-	-	-	-	-	-	-	-	-	-
MM	LT 15	460	LT 3	LT 3	LT 13	LT 8	LT 8	LT 15	-	Pass
OO.	LT 6	210	LT 1	2	LT 5	LT 3	LT 3	LT 6	0.0286	Pass
PP.	-	-	-	-	-	-	-	-	-	-
QQ.	LT 6	34	LT 1	1	LT 5	LT 3	LT 3	LT 6	0.0365	Pass
RR.	-	-	-	-	-	-	-	-	-	-
TT.	LT 15	450	LT 3	LT 3	LT 13	LT 8	LT 8	LT 15	-	Pass
UU.	LT 13	490	LT 2	LT 2	LT 11	LT 7	LT 7	LT 13	-	Pass

LT = Less Than

CR = Adjusted analytical result

mg/kg = milligrams per kilogram (ppm = parts per million)

* = Average of duplicate analyses

As = Arsenic, Ba = Barium, Cd = Cadmium,

Cr = Chromium, Hg = Mercury, Pb = Lead,

Sb = Antimony, Se = Selenium



BUREAU
VERITAS

Technical Report: (5107)235-0039

August 28, 2007
Page 9 of 9

EXHIBIT #1

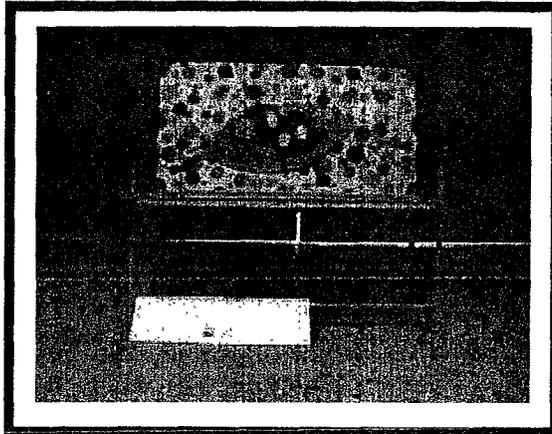


EXHIBIT #2

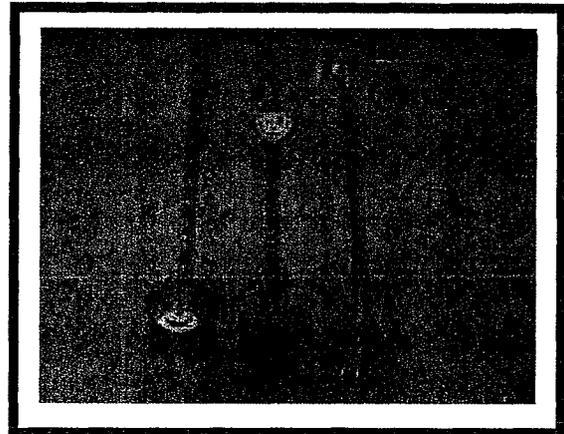


EXHIBIT #3

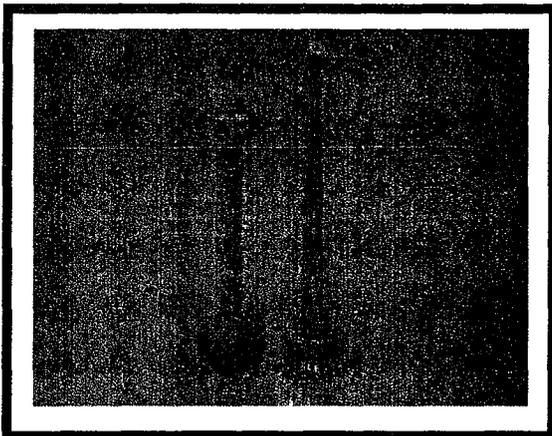


EXHIBIT #4

