IC2 Product Testing Workgroup Meeting Notes | October 22, 2025 at 3pm ET/ 12pm PT

Participants (17): Mikalah Bailey, André Algazi, Conor Shea, Amanda Charette, Stephanie Frisch, Kelleigh Wasser, Shaina Harkins, Sarah Briggs, Hannah McNeight, Michael Zahn, Sara Sekerak, Robert Brushia, Pierce Rigrod, Justin Waltz, Ivan Titaley, Nicole Orabona, and Mui Koltunov

Share Program Updates:

- CA DTSC: Summarizing findings on a suite of chemicals in nail products, one being toluene. Will publish the report soon and can share more at the end of November.
    - Question: At what point can those products no longer be sold in California?
        - There's a 60-day window for people to submit their priority product notifications. After the effective date and the stated deadline, no one should be selling.
        - The data in CA seems to show that the concentration of toluene is decreasing; 1ppm or less in some samples.

Discuss XRF, methods: quantitative or semi quantitative, pitfalls and successes
André presented Intro slides on XRF

- Questions for the group:
    1. For what purpose (screening, compliance testing, etc.)?
    2. What elements have you looked for?
    3. What sample matrices have you analyzed?
    4. Did the XRF data meet your data quality needs (for precision, accuracy, sensitivity, etc.)?
    5. What challenges did you encounter?
        - NYSDEC: Uses XRF for product testing and screening. For their hazardous packing act screening program. In collaboration with other states, they'll screen for heavy metals that are restricted such as lead, cadmium, mercury, and hexavalent chromium in packaging. Sometimes there is inconsistency with detection levels due to different angles, distances, and packaging materials. Some units have a consumer products mode, and some only have soil mode.
            - Question: Are there formal actions when violations are found? How are the results used?
                - When results are consistent, there will be follow up with the retailer and compel action based off of the screening results. Working on an SOP.
        - MPCA: Screened for lead, cadmium, halogenated flame retardants, bromine and chlorine. Have also screened soils, plastics, metals, toothpaste, semi solids etc., and change the XRF programming based on the matrices. XRF is used specifically

for screening purposes and not enforcement. They purchase products, scan them, and then based on concentration thresholds they determine which products need to be sent to the lab. On the low end, lab results tend to go lower but on the high end, lab results tend to go higher. Have picked up metals beyond the surface—can see lead under a coating.

- WA Ecology:
  - Has used XRF over a decade, for screening not enforcement. Data is kept internal and used to determine what should go to the lab. There is high potential for user error as XRF is not calibrated and optimized for a specific matrices type. They primarily use the consumer products mode for screening lead, cadmium, and other metals. XRF is able to read through low density materials and plastics; plastics might need increased scanning time. It's also sensitive to temperature changes.

Discuss topics for future meetings and identify volunteers to lead them:

- Will determine via email ahead of the next meeting. Next meeting rescheduled for Jan 7, 2026 at 3pm ET/ 12pm PT

Chat and Resources:

- Question on XRF use: Does anybody have a website, book or manual on best-practices with using an XRF?
  - There is an EPA Method 6200 on XRF but for environmental samples. We have an SOP we can share: https://apps.ecology.wa.gov/publications/SummaryPages/2203207.html