

CertiPUR-US® Technical Guidelines for Slabstock Foam

JANUARY 1, 2023



Physical Performance and Environmental Guidelines for Certification of Slabstock Flexible Polyurethane Foam for Use in Furniture and Bedding

January 1, 2023



CertiPUR-US® is a program of the Alliance for Flexible Polyurethane Foam, Inc.

www.certipur.us

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Thank you for your interest in the CertiPUR-US® program. For foam producers interested in certifying flexible polyurethane foam, this is the place to start – with the following pages that are the *Physical Performance and Environmental Guidelines for Certification of Slabstock Flexible Polyurethane Foam for Use in Furniture and Bedding*.

This document, we call the *Technical Guidelines*, contains the technical requirements for certification of flexible polyurethane foams through the CertiPUR-US® program. The *Technical Guidelines* were established with guidance from the global foam industry and in conjunction with the leadership of the mattress and upholstered furniture industries. In addition, an advisory panel of scientists, academics, environmentalists and representatives of consumer groups provided invaluable input in the development of the *Technical Guidelines*.

The CertiPUR-US® program is a voluntary testing, analysis and certification program for flexible polyurethane foam used as a cushioning material in home furnishings such as adult mattresses, crib mattresses, upholstered furniture and some accessory comfort products. Certified flexible polyurethane foams are independently laboratory tested and certified to be:

- ▶ Made without ozone depleters
- ▶ Made without PBDEs or the following Tris flame retardants: TCEP, TDBPP, TDCPP or TEPA
- ▶ Made without mercury, lead, and other heavy metals
- ▶ Made without formaldehyde
- ▶ Made without phthalates regulated by the Consumer Product Safety Commission
- ▶ Low VOC (Volatile Organic Compound) emissions for indoor air quality (less than 0.5 parts per million)

It is our policy to be transparent and to be responsive to changes in what we know about components of flexible polyurethane foam. We are continually evaluating information from the science community, stakeholders, and government and regulatory agencies to assess these *Technical Guidelines*.

For that reason, we consider these *Technical Guidelines* to be a living document that may be revised when good science and responsible regulatory concern warrant. Any changes are made by the consent of the Board of Directors of the Alliance for Flexible Polyurethane Foam, Inc., the nonprofit organization that manages the CertiPUR-US® program.

Policies related to revisions of the document and appropriate forms to request a revision may be obtained through info@certipur.us. Certification is restricted to prime flexible polyurethane foam intended for use in furniture and bedding applications. Any questions related to the certification requirements or process should also be directed to info@certipur.us.

Please contact me for guidance in the certification process. From application to submission of samples to navigating the testing requirements to using the CertiPUR-US® name and logo — we are here to assist you every step of the way.

Sincerely,

Michael Crowell

Executive Director
CertiPUR-US® program
Alliance for Flexible Polyurethane Foam, Inc.
mcrowell@certipur.us
828.452.5400

Section 1

Internal Physical Performance Testing

| Test | Pass | Test Method |
|--|---------------------------------------|---|
| 1) Average Density ¹ | Report | ASTM D3574 Test A |
| 2) Average 25% IFD ² and Tolerance | ± 3.0 lbs or +/- 10% max ³ | ASTM D3574 Test B ₁ |
| 3) 25% IFD loss after Fatigue Test Only applies to foams within 25% IFD range ⁴ of 24 to 36 lbs (100 – 160 N) | Loss < 6 lbs (26.7 N) | ASTM D3574 Test I ₃ (Procedure A) ⁵ |
| 4) 75% Compression set HR-type and Melamine-filled Foams All others (Conventional, Viscoelastic, etc) | 20.0% max 10.0% max | ASTM D3574 Test D |
| 5) Humid Aged 75% Compression Set HR-type and Melamine-filled Foams All others (Conventional, Viscoelastic, etc) | 30.0% max 10.0% max | ASTM D3574 Test D and J ⁶ |

¹ Average Density from testing of 15" x 15" x 4" (380 mm x 380 mm x 102 mm) samples prepared by the procedure below – "Sampling Procedure for Physical Testing"

² Average IFD @ 25% from testing of 15" x 15" x 4" (380 mm x 380 mm x 102 mm) samples prepared by the procedure below.

³ Maximum deviation of ± 10% of the Average 25% IFD or of 3.0 lbs (13.3 N) – whichever is greater – by any single sample from the Average 25% IFD.

⁴ Based on the Average 25% IFD in Test 2) using 15" x 15" x 4" (380 mm x 380 mm x 102 mm) samples. Test 3) does not apply to foams outside this range.

⁵ Constant Force Pounding, 8000 cycles ASTM D3574 Test I3 (Procedure A) / ISO 3385

⁶ ASTM 3574 Section J1 with Humid Aging followed by Section D Compression Set.

Sampling Procedure for Physical Testing

Product Selection: The product selected for Physical Testing shall be the same as for Analytical Testing (see Section 6).

Sample Origin: Central samples no less than 15 inches (35 cm) from a face or side of the bun shall be cut, no later than 7 days after foam production. If the foam bun is not large enough to allow the 15 in (35 cm) distance from the sides, the most central location is appropriate.

Size of Samples: 15 in x 15 in x 4 in (380 mm x 380 mm x 100 mm).

A vertical rectangular column 15" x 15" (380 mm x 380 mm) shall be cut to include both the top and the bottom surfaces of the produced foam. The lower 1" (25 mm) portion of the sample column shall be removed. Starting at this lower cut surface, the column shall be cut into 15" x 15" x 4" (380 mm x 380 mm x 100 mm) adjacent samples, discarding the upper trim segment such that the uppermost sample is at least 1" (25 mm) from the top skin of the produced foam. The samples shall be numbered sequentially starting from the upper sample. 25% IFD and density results shall be reported for at least the top, middle, and bottom samples for determination of 25% IFD Variance.

Physical Testing Report: The test data shall be submitted initially and with each renewal for each foam product group/family to the CertiPUR-US® program on the following "Internal Physical Performance Testing Report" form.

Section 2

Manufacturer Certifications

| | |
|--|----|
| Foam or adhesives processed with CFC or other Ozone Depleters | No |
| Foam or adhesives processed with MeCl2 or nPB (dichloromethane or n-propyl bromide) | No |
| Foam processed with BHT Polyol Additives | No |
| Foam processed with any PBDE Additives, TDCPP, TCEP, TEPA or TDBPP "Tris" flame retardants | No |

TECHNICAL GUIDELINES FOR SLABSTOCK FOAM

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Internal Physical Performance Testing Report for Slabstock Foam

Company Name:

Production Location:

Foam Product Group/Family:

Foam Identification (Grade):

Test Results*

Density and 25% IFD

Test Date:

| Sample Number | Density | 25% IFD | Limit |
|--|---------|---------|---------------------------|
| 1 (Top) | | | |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| 9 | | | |
| 10 | | | |
| 11 | | | |
| 12 | | | |
| Average of Above: | | | |
| 25% IFD Variance: | | | ± 10% or 3.0 lbs (13.3 N) |
| 25% IFD Loss After Fatigue: | | | |
| Test Date: | | | < 6 lbs (26.7 N) |
| 75% Compression Set: | | | |
| Test Date: | | | 10% (20% HR or melamine) |
| Humid Aged 75% Compression Set: | | | |
| Test Date: | | | 10% (30% HR or melamine) |

* For sampling procedures and test methods, see Section 1 of *Physical Performance and Environmental Guidelines for Certification of Slabstock Flexible Polyurethane Foam for Use in Furniture and Bedding*. www.certipur.us/technicalguidelines

I confirm the information above is accurate. First Name/Last Name (printed): _____

Signature: _____ Date: _____

Section 3

Independent Laboratory Emissions Testing⁷

| Substance | CAS Number | Guideline Limit [mg/m ³] |
|-----------------------|------------|--------------------------------------|
| Formaldehyde | 50-00-0 | <0.1 |
| Benzene | 71-43-2 | <0.5 |
| Toluene | 108-88-3 | <0.5 |
| Styrene | 100-42-5 | <0.3 |
| Vinylcyclohexene | 100-40-3 | < LOD* |
| 4-Phenylcyclohexene | 4994-16-5 | < LOD* |
| Butadiene | 106-99-0 | < LOD* |
| Vinyl Chloride | 75-01-4 | < LOD* |
| Aromatic hydrocarbons | | < 0.5 |
| TVOC Emissions | | < 0.5 |

⁷ Average Density and Average 25% IFD measured using procedures in Section 1 must be reported for the foam production used in Analytical Testing.

* Below the Limit of Detection

Test Method: ISO 16000-Parts 3, 6, 9, & 11 – with chamber volume of 0.5 or 1 m³. The foam sample is placed on the bottom of an emission test chamber and is conditioned for 72 hours at 23°C/50%RH, applying an air exchange rate n of 0.5 per hour and a chamber loading L of 0.4 m²/m³ (=total exposed surface of sample in relation to chamber dimensions without sealing edges and back) in accordance with ISO 16000-9 and ISO 16000-11.

Section 4

Independent Laboratory Analysis

Metals of Concern

| Substance | CAS Number | Guideline Limits (ppm) |
|---------------|------------|------------------------|
| Antimony (Sb) | 7440-36-0 | 60 |
| Arsenic (As) | 7440-38-2 | 25 |
| Barium (Ba) | 7440-39-3 | 1000 |
| Cadmium (Cd) | 7440-43-9 | 75 |
| Chromium (Cr) | 7440-47-3 | 60 |
| Lead (Pb) | 7439-92-1 | 90 |
| Mercury (Hg) | 7439-97-6 | 60 |
| Selenium (Se) | 7782-49-2 | 500 |

Digestive Test Method: ASTM F963-17 Standard Consumer Safety Specification for Toy Safety, Section 8.3.1: The sample is to be completely digested with acid and analyzed by Inductively Coupled Plasma (ICP). Flexible Foam under test to be digested per Consumer Product Safety Commission CPSC-CH-E1002-08.3 (Non-metal Substrates).

Testing also complies with Consumer Product Safety Improvement Act (CPSIA), Section 101 for total lead content. Limit of Quantitation (LOQ) should be <2.0 ppm for all substances.

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Tributyltin

| Substance | CAS Number | Guideline Limit [ppm] |
|-------------------|------------|-----------------------|
| Tributyltin (TBT) | 688-73-3 | 0.5 |

Test Method: The 0.2 in x 0.2 in x 0.2 in (5 mm x 5 mm x 5 mm) sample must be a composite of 6 pieces to be taken from beneath each sample face (to a maximum of 2 cm from the surface). The sample is cut and extracted for 1 hour with the extracting agent** in an ultrasonic bath at room temperature. After extraction the alkyl tin species are derivatized by adding sodium tetraethylborate solution in THF. The derivative is then extracted with n-hexane. The sample is then submitted to a second extraction procedure. Both hexane extracts are combined and further used to determine the organotin compounds by gas chromatography with mass selective detection in SIM modus.

** Extracting agent: 250 ml buffer*** + 1750 ml methanol + 300 ml acetic acid

*** Buffer (pH 4.5): 164 g sodium acetate + 1200 ml water + 165 ml acetic acid, to be diluted to 2000 ml with water

Phthalates

| Substance | CAS Number | Guideline Limit |
|----------------------|------------|-----------------|
| Sum of 8 phthalates* | | ≤ 0.01 wt % |

Test Method: Soxhlet extractor or heated ultrasonic bath as specified by CPSC test method, followed by analysis with gas chromatography/mass spectrometry (GC/MS), or high performance liquid ultraviolet chromatography (HPLC/UV).

* Phthalates include: Di-(2-ethylhexyl) phthalate (DEHP) (CAS No. 117-81-7), Dibutyl phthalate (DBP) (CAS No. 84-74-2), Benzyl butyl phthalate (BBP) (CAS No. 85-68-7), Diisononyl phthalate (DINP) (CAS No. 28553-12-0), Diisobutyl phthalate (DIBP) (CAS No. 84-69-5), Di-n-pentyl phthalate (DPENP) (CAS No. 131-18-0), Di-n-hexyl phthalate (DHEXP) (CAS No. 84-75-3), Dicyclohexyl phthalate (DCHP) (CAS No. 84-61-7)

TDA/MDA

| Substance | CAS Number | Guideline Limit |
|-------------------------------------|---------------------|-----------------|
| 2,4 – Toluenediamine (TDA) | 95-80-7 | ≤ 5.0 ppm |
| 4,4' – Diaminodiphenylmethane (MDA) | 10 1-77-9 | ≤ 5.0 ppm |
| Sum of TDA (2,4) plus MDA (4,4') | 95-80-7 + 10 1-77-9 | ≤ 5.0 ppm |

Test Method: A subsample shall be cut and extracted with 1% aqueous acetic acid solution. To achieve optimal sensitivity and selectivity, the extracts are analyzed using high pressure liquid chromatography with detection using mass spectrometry/mass spectrometry (HPLC/MS/MS).

Polybrominated (PBDE) Flame Retardant Additives

| Substance | CAS Number | Guideline Limit |
|--------------------------|------------|-----------------|
| pentabromodiphenyl ether | 32534-81-9 | ≤ 0.01 wt % |
| octabromodiphenyl ether | 32536-52-0 | ≤ 0.01 wt % |
| decabromodiphenyl ether | 1163-19-5 | ≤ 0.01 wt % |

Test Method: Analysis with gas chromatography/mass spectrometry (GC/MS).

TECHNICAL GUIDELINES FOR SLABSTOCK FOAM

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Important Change: Effective November 23, 2023, 2-ethyl hexanoic acid (CAS: 149-57-5) and most of its salts, including Stannous Octoate (CAS: 301-10-0), will be added to the list of prohibited substances and foams submitted for certification that contain Stannous Octoate will not be certified. For more information: www.certipur.us/stannous

Section 5 Prohibited Substances

GHS* (Globally Harmonized System of Classification and Labeling of Chemicals)

| GHS Hazard Class | Category | United States GHS Hazard Statements |
|-----------------------|----------|--|
| Carcinogen | 1A, 1B | May Cause Cancer |
| Germ Cell Mutagen | 1A, 1B | May Cause Genetic Defects |
| Reproductive toxicity | 1A, 1B | May Damage Fertility or the Unborn Child |

*GHS replaced R-Phrases (Based upon European Union Risk Assessments)

Blowing Agents

CFC
HCFC
Dichloromethane (methylene chloride)

Prohibited Flame Retardant Additives

CAS Number

| | |
|---|------------|
| Antimony (see Section 4) | 7440-36-0 |
| Chlorinated or brominated dioxins or furans | Various |
| Chlorinated hydrocarbons (1,1-,2,2-Tetrachloroethane; Pentachloroethane; 1,1-,2-Trichloroethane;1,1-Dichloroethylene) | Various |
| Decabromodiphenyl ether (PBDE) (see Section 4) | 1163-19-5 |
| Dimethyl methylphosphonate (DMMP) | 756-79-6 |
| Hexabromocyclododecane or HBCD | 3194-55-6 |
| Nitrites | Various |
| Octabromodiphenyl ether (PBDE) (see Section 4) | 32536-52-0 |
| Polybrominated Biphenyls (PBB) | 59536-65-1 |
| Polychlorinated Terphenyls (PCT) | 61788-33-8 |
| Polychlorinated Biphenyls (PCB) | 1336-36-3 |
| Pentabromodiphenyl ether (PBDE) (see Section 4) | 32534-81-9 |
| Tris (2,3-dibromopropyl) phosphate (TDBPP) | 126-72-7 |
| Tris-(aziridinyl)-phosphin oxide (TEPA) | 5455-55-1 |
| Tris (2-chloroethyl)-phosphate (TCEP) | 115-96-8 |
| Tris (1,3-dichloro-2-propyl) phosphate (TDCPP) | 13674-87-8 |
| Vinyl Chloride (see Section 3) | 75-01-4 |

Other Prohibited Substances

CAS Number

| | |
|------------------------------------|------------|
| Chlorinated phenols (PCP, TeCP) | 87-86-5 |
| Trimethylphosphate | 512-56-1 |
| Hexachlorocyclohexane | 58-89-9 |
| Monomethyldibromo-Diphenylmethane | 99688-47-8 |
| Monomethyldichloro-Diphenylmethane | 81161-70-8 |

Section 6

Sampling Procedure for Analytical Testing **New:** Three samples are now required for submission.

Product Selection: The product selected for Analytical Testing shall be one frequently produced within the Foam Product Group/Foam Family being certified and likely to be highest in emissions.

Sample Origin: Central samples no less than 15 inches (35 cm) from a face or side of the bun shall be cut, no later than 7 days after foam production. If the foam bun is not large enough to allow the 15 in (35 cm) distance from the sides, the most central location is appropriate.

Size of Samples: 10 in x 8 in x 6 in (25 cm x 20 cm x 15 cm).

Photo Verification: Take a photo of the sample block of foam (prior to cutting) that shows the foam type, production date, and size. Include the chemist or supervisor responsible in the photo. This photo will be part of your submittal package to the CertiPUR-US® program. See photos on page 9.

Number of Samples: Three adjacent samples shall be prepared and submitted for analysis to the laboratory. Keep an extra (fourth) packaged sample as a control. Care shall be taken to ensure that no oils, silicones or other volatile materials are present on the saw blade or saw table. Protective phthalate-free gloves should be worn to prevent sample exposure to soap or hand lotion. The samples each shall be conditioned using standard production procedures, packaged and identified as recommended below.

Time Constraints: The samples shall be cut out of the bun, no later than 7 days after production of the foam, and immediately packaged. Samples must be shipped to arrive at the testing lab less than 21 days after the production date and the lab must start the VOC chamber testing within 35 days of receiving the samples.

Packaging of Samples: Each 10 in x 8 in x 6 in (25 cm x 20 cm x 15 cm) sample shall be tightly wrapped and separately sealed in aluminum foil (one sample per foil package) or packaged separately inside sealed aluminized Mylar bags (one sample per bag). See photos on page 9.

Sample Identification: Sample Identification shall be recorded and placed inside the packaging box on each individually wrapped sample. The information shall include the foam product group/family (as in Section 8), density and firmness, company production reference code number, production date, date of sampling, and date of mailing to the laboratory. See form on page 8.

Section 7

Test Failures and Retesting

If a flexible foam manufacturer fails the requirements of the CertiPUR-US® program in one area of the analytical or physical property testing, the company will be allowed to have the same foam formulation retested under either of the following parameters:

- ▶ The CertiPUR-US® program will accept the retesting of the failed item of the program at the flexible foam manufacturer's expense, if
 - ▶ The failure does not exceed the relative standard deviation of analysis, and
 - ▶ The retest is completed within 30 days of the original analytical or physical property testing.

Or

- ▶ If the failure exceeds the relative standard of deviation of the analysis, the CertiPUR-US® program will accept an entire retest at the flexible foam manufacturer's expense, if the retest is completed within 45 days of the original analytical or physical property testing.

Both the original test results with the failed item and the applicable retest, that now shows a passing result, must be submitted with the remainder of the required paperwork and photos.

Section 8

Certification Groups/Foam Families

The manufacturer may certify groups (foam families) of equivalent qualified flexible polyurethane foam products (i.e. a number of FPF products having various physical characteristics, but sharing the same raw materials). Separate application and registration would be necessary for foam products manufactured from differing raw materials. It is the responsibility of the foam manufacturer to notify raw material suppliers when registration has been achieved so that they can advise the foam manufacturer if raw material formulation changes are anticipated during the duration of the registration period.

Foam producers have the option to add a branded name for any foam family category, including using that branded name as the sole identifier in the “other” foam family category. This enables customers to recognize a branded name as being certified. The branded names may appear in two places on the CertiPUR-US® website: 1) foam producer’s individual page and 2) foam producer’s certificate.

Slabstock Foam Families:

- ▶ Conventional foams
 - ▶ Conventional FR foams (sharing the same flame retardant package)
 - ▶ High resilience foams
 - ▶ High support foams
 - ▶ Super-soft (low density/low index) conventional foams –25% IFD ≤15 lbs. (65 N) and density ≤1.5 lbs/ft³ (24 kg/m³)
 - ▶ Viscoelastic (memory) foams
 - ▶ Viscoelastic (memory) foams with gel
 - ▶ Branded foams (any of the categories listed above with an exclusive branded name), please specify _____
 - ▶ _____
 - ▶ Other foams, please specify _____
 - ▶ _____
 - ▶ _____
- (subject to approval by program administrators)

*For molded foams, see separate **Technical Guidelines** for certification of molded foam.*

Section 9

Registration Duration

To maintain registration, sample evaluations are necessary at 6 month intervals for each foam family to help demonstrate formulation and raw material content consistency. After completing two consecutive 6 month successful certifications, recertification is required annually. Any significant changes to the formulation shall require analysis and re-registration.

CertiPUR-US® testing and analysis laboratory options:

Eurofins Product Testing A/S

Smedeskovvej 38
 DK-8464
 Galten, Denmark
 Phone: (country code) +45 7022 4276
 Fax: (country code) +45 7022 4275
 Email: voc@eurofins.com

Intertek

Attn: VOC Lab/CertiPUR-US Testing
 4700 Broadmoor, Ste. 200
 Kentwood, MI 49512 USA
 Attn: Dr. Jesse Ondersma
 Phone: +1 616.656.7401
 Email: certipur.us@intertek.com

TÜV Rheinland LGA Products GmbH

Tillystraße 2
 90431 Nuremberg, Germany
 Attn: Dr. Jelena Galinkina
 Phone: (country code) +49 911 655 5614
 Alt. Phone: (country code) +49 911 655 5604
 Fax: (country code) +49 911 655 5604
 Email: jelena.galinkina@de.tuv.com



Sample Submittal and Analytical Request CertiPUR-US® Slabstock Certification Program

Attention: _____

Date: _____

Invoice to:

Ship via express to:

Company Name: _____

Lab Name: _____

Email: _____

Address 1: _____

Address 1: _____

Address 2: _____

Address 2: _____

City: _____

City: _____

State/Province: _____

State/Province: _____

Zip/Postal Code: _____

Zip/Postal Code: _____

Country: _____

Country: _____

Attention: _____

Purchase Order Number: _____

Sample Identification:

| | |
|---|---|
| Your Product Identification Code | |
| Foam Product Group/Family * | |
| If "Other" Or "Brand" Foam, Specify | |
| Foam Density/IFD | |
| Production Date | |
| Date Sample Cut (<7 days from Production) | |
| Date Sample Shipped | |
| Sample Arrival Date (<21 days from Production) | This information will be reported by the testing laboratory |
| Date VOC Chamber Testing Started (<42 days from Production) | This information will be reported by the testing laboratory |

*See Section 8

Analytical Request:

- TVOC Emissions Testing
- Extractable heavy metals
- Tributyltin (TBT)
- Sum of eight specified phthalates
- Penta, Octa, Deca bromodiphenylethers (PBDEs) flame retardants
- 2,4-Toluediamine (TDA) and 4,4'-Diaminodiphenylmethane (MDA)
- Specified Volatile Organic Compounds and total Volatile Organic Compounds

Effective November 1, 2022:
Submit **three** samples to lab. Keep an extra (fourth) packaged sample as a control.

TECHNICAL GUIDELINES FOR SLABSTOCK FOAM

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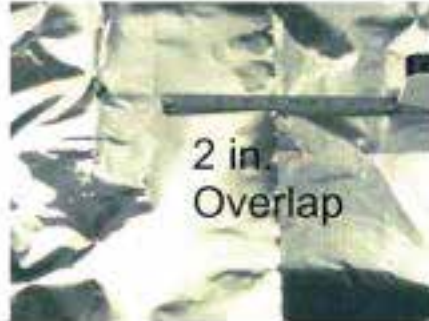
Sample Packaging Instructions for Slabstock Foam **New:** Three samples are now required for submission.

1. Please be sure to wear phthalate-free PU or latex gloves while handling samples. This will keep the samples from contamination by soap or fragrances.
2. Check and clean the knife blade and saw table before cutting samples to prevent contamination from residue.
3. Individually seal four samples tightly in heavy gauge aluminum foil wrappers. Before making the final fold and seal, evacuate as much excess air as possible without resulting in a compressed sample. Submit three samples to the laboratory and keep one packaged sample as a control.
4. Please complete the Sample Submittal Form (page 8).
5. Tape a duplicate Sample Submittal Form to the outside of each foil package/sample.
6. Place the samples in a cardboard box, including complete Sample Submittal Form and ship to a selected laboratory (page 7) via express delivery service.

Note: Before taking samples, review details on page 6.



Use 18" wide heavy duty aluminum foil. Place two 26" pieces side-by-side.



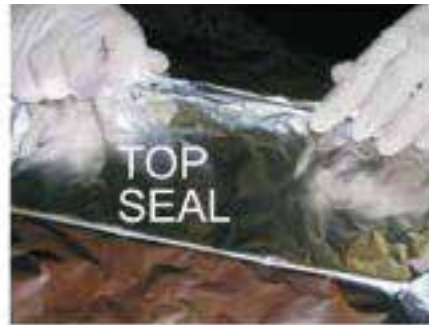
Overlap the two pieces by 2" – lengthwise.



Lift the overlap, crease and fold flat for the length of the seam (26").



Place the foam sample in the center of the joined foil sheet lengthwise on top of the seam.



Join the side panels together at the top. Pinch the overlap, roll over twice and fold flat to seal.



Pinch the foil on the ends and squeeze together.



Roll the ends twice and press flat against the foam block.



The finished foil wrapped sample should be tightly sealed on all sides.

Remember: Only one sample per foil package.



Take a photo of chemist or supervisor next to foam block from which sample was taken. On foam block, print on a label, this information:

Foam Identification: (Example: 100)
Production Date: Month/Day/Year
Size: Width x Length x Height