NEF FG Multipurpose Oil Evaluation Report

1/31/11

Introduction

Dorel Juvenile Group (DJG) has performed research and testing in evaluating a potential remedy for addressing the small percentage of center front adjusters on certain platforms which exhibit performance issues. The following report is the DJG evaluation and conclusion of this potential remedy.

Evaluation

Examination of returned Center Front Adjusters (CFA's) that exhibited performance issues indicated that the harness release lever did not rotate freely and several felt "gravelly" when activating the lock pawl. Comparison of release lever rotational forces indicated that the returned units exhibited significantly less rotational force than fully functional, new adjusters.

Disassembly and examination of CFA's exhibiting performance issues by Exponent Engineering revealed some level of pitting and galling on the pivot pin. (The evaluation by Exponent of the potential reasons for differentiation among platforms, relative to the CFA performance issue complaints continues. An update will be provided.)

It was also observed that a unit exhibiting poor performance could be made to lock properly when upward force was applied to the end of the release lever. It was then reasoned that the cause of poor performance was that after having been depressed, the release lever did not rotate freely to its pre-lock position. The pre-lock position being that where at least two of the teeth on the adjustment lever are in intimate contact with the webbing, such that loosening force applied to the harness draws the adjuster webbing deeper into the camming action of the adjustment lever and binds it firmly between the adjuster lever teeth and the floor of the adjuster frame.

For these reasons, various lubricants were applied to the pivot pin to enable free rotation of the adjustment lever. [redacted]

Redacted

After consultation with two lubricant industry specialists, and preliminary evaluation of the lubricants listed above, NEF FG Multipurpose Oil was chosen for further evaluation after initial performance testing and its designation as a machinery lubricant in the food industry.

[redacted]

Redacted

Conclusion

NEF oil effectively remedies consumer returned center front adjusters. The proposal to lubricate the CFA's with NEF oil will remedy the potential performance issue observed in the small percentage of units which may be at issue. The application of this lubricant will not negatively affect a properly performing CFA. The testing performed by DJG indicates that the proposed remedy will be effective, well in excess of the expected life of the child restraint system.

Two Pages Submitted To Office Of Chief Counsel
With Request For Confidential Treatment

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NEF

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NEF FG Multi-Purpose Oil

DESCRIPTION:

NEF FG Multi-Purpose Oil is a readily biodegradable, biobased high performance multi-purpose lubricant designed for commercial, household, and general lubrication applications. It is ideal for use on oven and conveyor chains, wire ropes, cables, slides, open mechanisms, and light duty metal cutting and tapping applications. Its excellent lubricity and temperature stability provide smooth mechanical performance and superior antiwear protection. **NEF FG Multi-Purpose Oil** is NSF registered (141200) as meeting the guidelines of an H1 product for incidental food contact.

FEATURES:

- Readily biodegradable, non-flammable, NSF H1 Food Grade product
- Superior temperature & oxidation stability.
- High Viscosity Index (VI)
- Excellent Extreme Pressure (EP) and AntiWear (AW) lubrication
- Excellent water displacement
- Stops Squeaks

TECHNICAL DATA:

ISO Grade:	ASTM D217	22				
Specific Gravity:		.89				
Viscosity:						
@40°C, cSt:	ASTM D445	22				
Pour Point°F (°C):	ASTM D97	0 (-18)				
Flash Point°F (°C):	ASTM D92	>350(177)				
Copper Corrosion:	ASTM D4048	Pass				
Rust Test, A & B:	ASTM D665	1A				
Biodegradability, %:	CEC-L-33-A-94	>90				
Suggested Operating Range		10 to 150F				

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732-988-0909 • 800-342-1611 • Fax: 732-502-0526 • www.terriss.com

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MATERIAL SAFETY DATA SHEET

SECTION 1: CHEMICAL PRODUCT AND COMPANY INFORMATION

***Company Identification*:**
Terriss Consolidated Industries, Inc.
807 Summerfield Avenue
Asbury Park, NJ 07712

***Emergency Contact*:** **Terriss: 732-988-0909**

***Health Emergency*:** Contact the Local Poison Control Center.

***Product Name*:** **NEF FG Multi-Purpose Oil**

***Product Family*:** **NEF**

***Date*:** 2/23/2010

Health HMIS 0
Flammability HMIS 1
Reactivity HMIS 0
Personal Protection HMIS B

SECTION 2: HAZARDOUS INGREDIENTS / EXPOSURE LIMITS

Ingredients:	*CAS#*	OSHA	ACGIH
Not Classified as Hazardous			

SECTION 3: HAZARDS IDENTIFICATION

***Overexposure (Acute)*:** General: Low oral and dermal toxicity.

***Eye Contact*:** May cause eye irritation.

***Skin Contact*:** May cause skin irritation.

***Inhalation*:** Prolonged exposure to high vapor concentration can cause headache, nausea, dizziness and central nervous system depression. In rare cases, may sensitize heart muscles and cause arrythmia.

***Ingestion*:** Not expected to be a problem if small amounts are ingested. Ingestion of larger amounts may cause stomach discomfort, nausea and vomiting.

SECTION 4: FIRST AID MEASURES

***Eye Contact*:** Flush eyes with water for 15 minutes. Get medical attention if irritation develops.

***Skin Contact*:** Wash skin with soap and water. Get medical attention if irritation persists.

***Inhalation*:** Vapor inhalation under ambient conditions is not normally a problem. If overcome by vapors from overheated product, remove to fresh air. Give artificial respiration or oxygen if necessary. Get medical attention if discomfort continues.

***Ingestion*:** Not expected to be a problem if ingested. Get medical attention if physical discomfort occurs.

SECTION 5: FIRE FIGHTING MEASURES

***Flash Point*:** >350ºF

***Extinguishing Media*:** Use CO2, dry chemicals, sand, dolomite, etc.; alcohol resistant foam, water spray, fog or mist.

***Fire Safety Procedure*:** Wear self-contained breathing apparatus and full turn out gear to fight fire. Use water to keep exposed containers cool and disperse vapors. Avoid spreading liquid and fire by water flooding.

***Unusual Fire Hazard*:** Empty containers contain residue and/or vapors. Do not weld, cut. pressurize, braze, solder, drill, grind or expose to heat, sparks or flame.

SECTION 6: ACCIDENTAL RELEASE MEASURES / DISPOSAL

***Environmental Impact*:** This product is >90% biodegradable, non-toxic, and is not expected to have adverse effects on humans or the environment, including fish and wildlife.

***Procedures for Spill*:** Evacuate non-essential personnel. Use personal protective equipment. Remove sources of ignition, ventilate spill area, prevent entry into sewers and waterways. Pick up free material for recycle or disposal. Absorb residual liquid with inert material.

***Waste Management*:** Dispose of according to federal, state and local regulations.

SECTION 7: HANDLING AND STORAGE

***Handling Procedures*:** Wash hands thoroughly after handling material. Avoid contact with skin and eyes.

***Storage Procedures*:** Do not store near potential sources of ignition. Store in a well ventilated area. Keep lid closed when not in use.

SECTION 8: EXPOSURE CONTROLS / PERSONAL PROTECTION

***Protective Equipment*:** Impermeable gloves, splash goggles, eye wash and safety shower.

***Respiratory Protection*:** If overheated, use approved respiratory protective equipment.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

***Appearance / Odor*:** Light amber; mild odor.
***Specific Gravity*:** <1.0
***Boiling point, 760 mm Hg*:** Not Determined.
***Vapor Pressure*:** Not Determined.
***Freezing Point*:** Not
***Solubility in H2O, % by Volume*:** Not
***Volatiles, % by Volume*:** 0%
***Evaporation Rate, Butyl Acetate=1*:** Not Determined.

SECTION 10: STABILITY AND REACTIVITY

***Thermal Stability*:** Stable.
***Materials to Avoid*:** Strong oxidizers.
***Hazardous Polymerization*:** Will not occur.
***Hazardous Decomposition Products*:** In the case of incomplete combustion, will produce oxides of carbon and carbon dioxide.

SECTION 11: TOXICOLOGICAL INFORMATION

***Toxicologocal Information*:** No experimental toxicological data on the product as such are available.

SECTION 12: TRANSPORTATION INFORMATION

***U.S. DOT*:** Not regulated by DOT as a hazadous material.

SECTION 13: REGULATORY INFORMATION

***U.S. TSCA Inventory*:** All components of this product are listed on the TSCA inventory.
***SARA Extremely Hazardous Sub*:** Not listed as such.
***SARA Section 313*:** Does not contain any 313 ingredients.
***CERCLA Hazardous Substances*:** No reportable quantity for this product or its components.
***Calif Prop 65*:** Not Listed.

***RCRA Status*:**

SECTION 14: OTHER INFORMATION

The information presented herein has been compiled from sources considered to be reliable and is accurate to the best of Terriss' knowledge. However, Terriss makes no warranty whatsoever, expressed or implied, of merchantability or of fitness for a particular purpose, regarding the accuracy of such data or the results to be obtained from the use thereof. Terriss assumes no responsibility for injury to recipient or to third persons or for any damage to property: recipient assumes all such risks.

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January 31, 2011

To Whom It May Concern,

This is to certify that NEF FG Multi Purpose Oil contains 81% Canola Oil.

The remaining ingredients are proprietary.

Joan Goldberg
VP of Marketing

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