

Title: **LINEN SPRAY**  
 Protocol Number: **KOHL'S – 110 D – LINEN SPRAY (NON-AEROSAL)**

Test Property	Test Method	Samples	Test Principle / Requirements	Rating (Section or exec. Summary which failed items can be referenced)
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LABELING				
Labeling / Packaging Review	FPLA 16 CFR 500 & 19 CFR 134	1 Sample	Should be legibly marked with the following information: <ul style="list-style-type: none"> <li>Distributor's name, trademark or other means of identification of the manufacturer or packer &amp; address (City, State &amp; Zip)</li> <li>Product identification</li> <li>Net quantity of the contents in terms of weight, measure or numerical count (Metric &amp; US Standard) or a combination so as to give accurate information and facilitate value comparison by the consumer</li> <li>Country of origin (if imported)</li> </ul>	
U.S. Flammable Liquids Labeling	16 CFR 1500.3(c)(6)(i)-(iii)/16 CFR 1500.439(a)	1 Sample	Flammable liquid products for household use shall bear a flammability warning to prevent hazard as defined in 16 CFR 1500.36(c)(6)(i-iii) based on the flash point test results. Note: Liquid is defined as any material which is free flowing, has not fixed shape and would take the shape of its container.	
Labeling of Hazardous Substances (if applicable)	16 CFR 1500.121 / 16 CFR 1500.3(b)(14)(i)	1 Sample	Applicable to toxic, skin irritant, eye irritant, corrosive, strong sensitizer, extremely flammable, flammable, combustible and hazardous substance requiring special labeling according to 16 CFR 1500.14(b)(1-5).  Product containing hazardous substances shall conform to and be consistent with the labeling requirements as defined by 16 CFR 1500.3(b) (14) (i) and special labeling requirement according to 16 CFR 1500.14(b) (1-5).  Note: Only labeling review of defined "signal words", "statement(s)", and "principal hazard(s)" are conducted. Other materials, i.e., generic chemical name, precautionary measures, first-aid, instructions are reported as data only. Information not on the PDP is not evaluated. The act also provides exemptions for the labeling of hazardous substance according to 16 CFR 1500.83, which is not included in the evaluation of labeling of hazardous substances. <b>-Document review (validity for five years) can be preceded if testing report is co-submitted with samples</b>	

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Poison Prevention Packaging	16 CFR 1700.20	All Samples	<p>Substances specified in the regulations shall have special packaging that meets all applicable requirements.</p> <p>NOTE:</p> <ol style="list-style-type: none"> <li>1) Vendor shall be responsible for the accuracy of information provided. In lieu of testing, a valid 3<sup>rd</sup> party test report to this packaging requirement has to be provided (Document is valid for 1 year)</li> <li>2) Specified substances include furniture polish, several types of drugs and cosmetics, solvents for paint or other similar surface coating materials, etc. See 16 CFR 1700.14 for details.</li> </ol>	
Verify Label Claims	Visual Check	All Samples	The labeling must comply and valid with all claims.	
Warning Label Review	Visual Check	All Samples	“Do Not Place Directly On Furnishings.” “Keep Out Of Reach Of Children And Pets.” “Do Not Ingest.”	
EPA TSCA Title VI – Composite Wood - Sample Declaration Form and Mill Certificate (if applicable)	40 CFR 770	All Samples	<p>If wood of any type is present in the sample, submitter shall provide a completed and signed Sample Declaration Form. Sections A, B, and E of the Sample Declaration Form must always be completed.</p> <ul style="list-style-type: none"> <li>• If regulated composite wood is not present in the sample, result is N/A.</li> <li>• If regulated composite wood is present in the sample:                             <ul style="list-style-type: none"> <li>- Submitter shall provide a copy of the certificate issued by the Third Party Certifier (TPC) for the mill(s) from which the raw panels were purchased</li> <li>- All information on the certificate shall be consistent with the Sample Declaration Form</li> <li>- Section D of the Sample Declaration Form must also be completed</li> </ul> </li> </ul> <p>Notes:</p> <ul style="list-style-type: none"> <li>• Include a copy of the Sample Declaration Form in the report</li> <li>• Regulated composite wood includes:                             <ul style="list-style-type: none"> <li>- Hardwood plywood (HWPW)</li> <li>- Medium-density fiberboard (MDF)</li> </ul> </li> </ul>	

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			- Thin medium-density fiberboard (Thin MDF) - Particleboard (PB) • Mill certificate must indicate compliance with TSCA Title VI. It is no longer acceptable to have the certificate indicate compliance with CARB's ATCM for formaldehyde in lieu of compliance with TSCA Title VI.	
EPA TSCA Title VI – Composite Wood - Raw Panel Labeling (if applicable)	40 CFR 770.45(a)	All Samples	•Panels or bundles of panels must be labeled with the following: - The panel producer's name - The lot number - The number of the EPA TSCA Title VI Third Party Certifier (TPC) - A statement of compliance to denote that the panels comply with TSCA Title VI  Notes: •A panel producer number may be used instead of a name to protect identity •Raw panels are regulated composite wood products that have not been used to create a finished good •The compliance statement must denote compliance with the TSCA Title VI. It is no longer acceptable to have the panel labeled as compliant with CARB's ATCM for formaldehyde in lieu of TSCA Title VI compliance statement.	
Formaldehyde Emission of Composite Wood Product - State of California (if applicable)	Airborne Toxic Control Measure (ATCM), California Code of Regulations, Title 17, § 93120	All Samples	Composite wood products include finished goods composed of or containing hardwood plywood (HWPW) made with either a combination core (CC) or a veneer core (VC), particleboard (PB), and medium-density fiberboard (MDF), or finished goods composed of such products made with no-added formaldehyde based (NAF-based) resins or ultra-low emitting formaldehyde (ULEF) resins, shall not release formaldehyde exceeding the regulatory limits.  In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.	
<b>LABELING – continued</b>				
Labeling of Composite Wood Product - Formaldehyde	Airborne Toxic Control	All Samples	Composite wood products include finished goods composed of or containing hardwood plywood	

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Emission - State of California (if applicable)	Measure (ATCM), California Code of Regulations, Title 17, § 93120		<p>(HWPW) made with either a combination core (CC) or a veneer core (VC), particleboard (PB), and medium-density fiberboard (MDF)), or finished goods composed of such products made with no-added formaldehyde based (NAF-based) resins or ultra-low emitting formaldehyde (ULEF) resins, shall be labeled in accordance with the regulations and meet all applicable requirements.</p> <p>In lieu of testing, valid certificate or test report or certificate can be submitted if dated within one year.</p>	
EPA TSCA Title VI – Composite Wood – Finished Good Labeling (if applicable)	40 CFR 770.45(c) / 40 CFR 770.45(e)	All Samples	<p>Finished goods containing regulated composite wood shall comply with the labeling requirements found in 40 CFR 770.45(c) unless the finished good qualifies for the de minimis exception found in 40 CFR 770.45(e).</p> <ul style="list-style-type: none"> <li>•A finished good does not require labeling per 40 CFR 770.45(c) if the finished good does qualify for the de minimis exception in 40 CFR 770.45(e). If the finished good does qualify for the de minimis exception, result is N/A.</li> <li>•A finished good does require labeling per 40 CFR 770.45(c) if the finished good does not qualify for the de minimis exception in 40 CFR 770.45(e).               <ul style="list-style-type: none"> <li>-At a minimum, the label must be on the product OR the packaging</li> <li>-The label may be applied as a stamp, tag, or sticker</li> <li>-The label shall include, at a minimum, in legible English text:                   <ol style="list-style-type: none"> <li>1. Fabricator's name</li> <li>2. Date the finished good was produced (in month/year format)</li> <li>3. A statement of compliance to denote that the finished good complies with TSCA Title VI</li> </ol> </li> </ul> </li> </ul> <p>Example:            XXX Company            MM/YYYY            EPA TSCA Title VI compliant for formaldehyde</p> <p>Notes:            •A de minimis amount of regulated composite wood is defined as regulated composite wood content not exceeding 144 square inches, based on the surface area of the largest face of the</p>	

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			finished good. •The de minimis exception is not available to finished goods or component parts that are designed to be used in combination or in multiples to create larger surfaces, finished goods, or component parts. •When a statement of compliance is necessary, the statement must denote that the finished good complies with TSCA Title VI. It is no longer acceptable to have the product labeled as compliant with CARB's ATCM for formaldehyde in	
Import Permit (For Natural Materials Only)	US Department of Agriculture Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ)	All Samples	Product shall not have prohibited materials present per US Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ)  Documentation and/ or proper permit(s) for specific product shall be supplied along with Testing Request form and samples.  Permit information may be found at: <a href="https://www.aphis.usda.gov/wps/portal/aphis/home/">https://www.aphis.usda.gov/wps/portal/aphis/home/</a>  It is the vendor's responsibility for the compliance to relevant requirements.	
Adult Tracking Label: **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum required information (MR.QA.PI@kohls.com)	Kohl's Requirement	All Samples	Can be included on packaging when necessary: Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #	
CA CPRTKA	Refer to 120 protocol	All Samples	All samples shall be reviewed on the requirements of California Cleaning Products Right to Know Act to determine if labeling is adequate.  The protocol may apply to household products including, but not limited to: Air fresheners, Candles with air freshener claims, Automotive cleaning products; Windshield wiper fluid; General cleaning products; Shoe and leather cleaners; Laundry detergents; Wood polish; and Floor maintenance products. Please work with Kohl's Product Integrity if you have any questions.	

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PHYSICAL CHARACTERISTICS				
Net Weight (oz. & gm)	Std. Measure	3 Samples	Max. +5% / -0% of claimed weight. Record actual data if there is no claim.	Claim: Actual:
Overall Dimensions (if applicable)	Std. Measure	3 Samples	Report Actual. Shall comply with any claims.	
Overall Weight (if applicable)	Std. Measure	3 Samples	Report Actual. Shall comply with any claims.	
Part Inventory	Visual Check	1 Sample	Shall meet label claims.	
Fragrance-in use	Actual Use	1 Sample	Report Actual. Shall have no objectionable or off odors	
CONSTRUCTION QUALITIES				
Kohl's Workmanship Review	Visual Check / Actual Use	All Samples	<ul style="list-style-type: none"> <li>All components shall be provided as claimed and shall not have excessive amount of settlings.</li> <li>All hardware shall be provided</li> <li>All welds shall be smoothly finished and free from pits and splatter</li> <li>All components shall not contain any burrs or sharp edges (Test by touch or sight)</li> <li>Product shall not contain any loose components or unsecured fastening where rigidity is required</li> </ul>	

PERFORMANCE				
Fragrance (If Applicable)	Sensory	All Samples	Must comply with claim	
Moisture Content	Std. Measure	3 Samples	Record actual data.	
#Claim Verification (If Claimed)	Visual Check / Actual Use	1 Sample	All designs and features must conform to actual claim	Claim:
Leakage Test (for container filled with liquid)	Visual Check	1 Sample	The closure is hand-tightened and the container is put upside down. No leakage shall be observed after 2 hours.	
Effects of Low and High Temperature/Humidity (Environmental)	Kohl's TM 30	1 Sample	24 hours @ 0°F (-18°C) and 24 hours @ 95% RH/120°F (49°C). No failure or adverse effect.	
Ease of Assembly/Installation (if applicable)	Actual Use	1 Sample	Shall present no difficulties during assembly and installation when following instructions.	
Functionality	Actual Use	1 Sample	Shall function as intended as received.	
Cycle Test/Test for Buttons, Switches, and/or Moving Components	Actual Use	1 Sample	Shall have no breakage, loss of functionality, loss of serviceability after 200 times/cycles use of buttons, switches, and/or moving components.	

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(if applicable)				
Stability	Actual Use	1 Sample	Free-standing article shall remain stable without tipping at 10° incline.	
Breaking Strength (textiles only)	ASTM D5034	1 Sample	Min 15 lbs/in	

**PERFORMANCE**

Colorfastness to Light (textiles only)	AATCC 16.3	1 Sample	Grade 3.0 minimum at 20 hours for indoor items. Grade 4.0 minimum at 40 hours for outdoor items. Note: Fade Resistant claims, applicable only to outdoor products, curtains, & upholstered furniture with UV resistant, shall have a Grade 3.0 at 60 hours.	
Colorfastness to Crocking (textiles only)	AATCC 8/116	1 Sample	Dry – Class 4.0 min. Wet – Class 3.0 min.	
Colorfastness to Water (textiles only)	AATCC 107	1 Sample	Class 4.0 min.	
*Drop Test (for non-fragile items)	Actual Use	1 Sample	No breakage or separation after 3 drops from 3 feet onto vinyl-tiled concrete floor.	
*Resistance to Corrosion (For metal component)	ASTM B117	1 Sample	Metal component shall withstand 24 hours in 5% salt spray (fog) with no major corrosion or visual change.	

**FLAMMABILITY**

Flammability* (for self-pressurized containers)	16 CFR 1500.45	1 Sample	Self-pressurized container must meet the flammability requirements for 16 CFR 1500.3(c)(6)(viii).	
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Flash point of liquids	ASTM D92	1 Sample	To identify the presence of potentially volatile materials. All liquid items shall have the flash point with the follow classification: Classification: flash point Extremely flammable: Less than or equal to 20°F (-6.7°C). Flammable: Great than 20°F (-6.7°C) and less than 100°F (37.8°C) Combustible: Greater than or equal to 100°F (37.8°C) and less than or equal to 150°F (65.8°C) Non-combustible: Greater than 150°F (65.6°C) Report results/classification as DATA only. Note: Liquid is defined as any material which is free flowing, has not fixed shape and would take the shape of its container.	
U.S. Flammable Liquids Labeling	16 CFR 1500.3(c)(6) (i)-(iii)/16 CFR 1500.439(a)	1 Sample	Flammable liquid products for household use shall bear a flammability warning to prevent hazard as defined in 16 CFR 1500.3(c)(6)(i-iii) based on the flash point results. Note: Liquid is defined as any material which is free flowing, has not fixed shape and would take the shape of its container.	
<b>FLAMMABILITY</b>				
Flammability of Solids (if applicable)	16 CFR 1500.44	1 Sample	Shall not burn at a rate exceeding 0.1 in./sec.	
<b>TOXICITY</b>				
*Toxicological Risk Assessment (TRA) On The Formulation	16 CFR 1500.3	All samples	Evaluate the safety of the product by a toxicologist. Review the hazard, exposure and risk associated with the ingredient.  <i>Vendor can submit a 3rd party test report for review if it is within two years of the report issue date.</i>	
<b>ANALYTICAL</b>				
*Lead In Scrapable Surface Coating	CPSC-CH-E1003-09	1 Sample	≤90 ppm (0.0090% by weight) (CPSA – 16 CFR 1303)	
*Special Labeling of Hazardous Substance (if applicable)	16 CFR 1500.3(b)(14)(i)/16 CFR 1500.14(b)(1-5)	All Samples	Applicable to products containing Diethylene glycol, Ethylene glycol, Benzene toluene, xylene, petroleum distillates, Methyl alcohol (methanol), and/or Turpentine. Product containing hazardous substances found	

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Federal and State Consumer Product VOC Compliance – Document Review (if applicable)	40 CFR Parts 9 and 59, California Code of Regulations Title 17. Division 3. Chapter 1. Subchapter 8.5. Article 2., and OTC State Model Rule for Consumer Products Regulation	1 Sample	<p>in 16 CFR 1500.14(1-5) shall conform to and be consistent with the special labeling requirement according to 16 CFR 1500.14(b)(1-5).</p> <p>Any person who sells, supplies, offers for sale, or manufactures consumer products for use in the United State shall comply with the applicable VOC limits outlined in the federal and state regulations including:                      -EPA 40 CFR 9, 59                      -California Code of Regulations Title 176, Divison 3, Ch 1, Subch.8.5, Article 2                      -Ozone Transport Commissions (OTC) State Model Rule for Consumer Products</p> <p>Applicable testing shall be conducted to substantiate compliance to the regulations.</p> <p>This documentation confirms that (give exact product name/model #(s)/type(s), with colors/fragrances) made by (name of company) for sale in (name of country) meets all applicable US Federal and State consumer product requirements.</p> <p>NOTE: It is the vendor's responsibility to meet this requirement.</p>	
<b>ANALYTICAL</b>				
* CA Prop 65	Refer to Protocol 1300	All Samples	All samples shall be reviewed against the requirements of California Proposition 65 to determine if additional testing or labeling is required.	
*Safety Data Sheet (SDS)	29 CFR 1910.1200 (g)	All samples	29 CFR 1910.1200 (g)  <b>To be rated as a PASS/FAIL</b> Vendor must submit SDS for review at the time of testing. SDS report must be attached to the test report.	

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<b>MICROBIAL</b>				
*Standard Bacteria Count (HPC)	APHA 9215B	300 mL	500 HPC Maximum	
*Coliform Count	APHA 9222B	300 mL	Must not be present	
*Mould & Yeast	FDA 8 <sup>th</sup> Rev. A, 1998, Chapter 18	300 mL	< 1 cfu/mL	
Cautionary Labeling - Leakage (if applicable)	Visual Check	1 Sample	Liquid filled article is recommended to be labeled with <b>“Caution: Stop using immediately if leakage occurs.”</b> or equivalent text.  Report presence of the label. No pass/fail verdict.	

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**ADDITIONAL NOTE:**

\*Please refer to Kohl's preferred third party labs for individual pricing and samples.



**KOHL'S TEST PROTOCOL**

Title: LINEN SPRAY  
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Protocol Version	Description of Change	Revised by / Date	Approved by / Date
110-A	Initial Release	Charlene Swanson January 2020	Charlene Swanson January 2020
110-B	Updated Adult Tracking Label requirements, updated composite wood requirements, updated SDS requirements	Charlene Swanson June 2020	Charlene Swanson June 2020
110-C	Updated SDS requirements, format, composite wood labeling requirements, added labeling of hazardous substances, and poison prevention packaging, Special Labeling of Hazardous Substance, updated VOC requirements	Charlene Swanson August 2020	Charlene Swanson August 2020
110-D	Added test line in labeling for CA CPRTKA and at the footer of the protocol	Charlene Swanson February 2021	Charlene Swanson February 2021