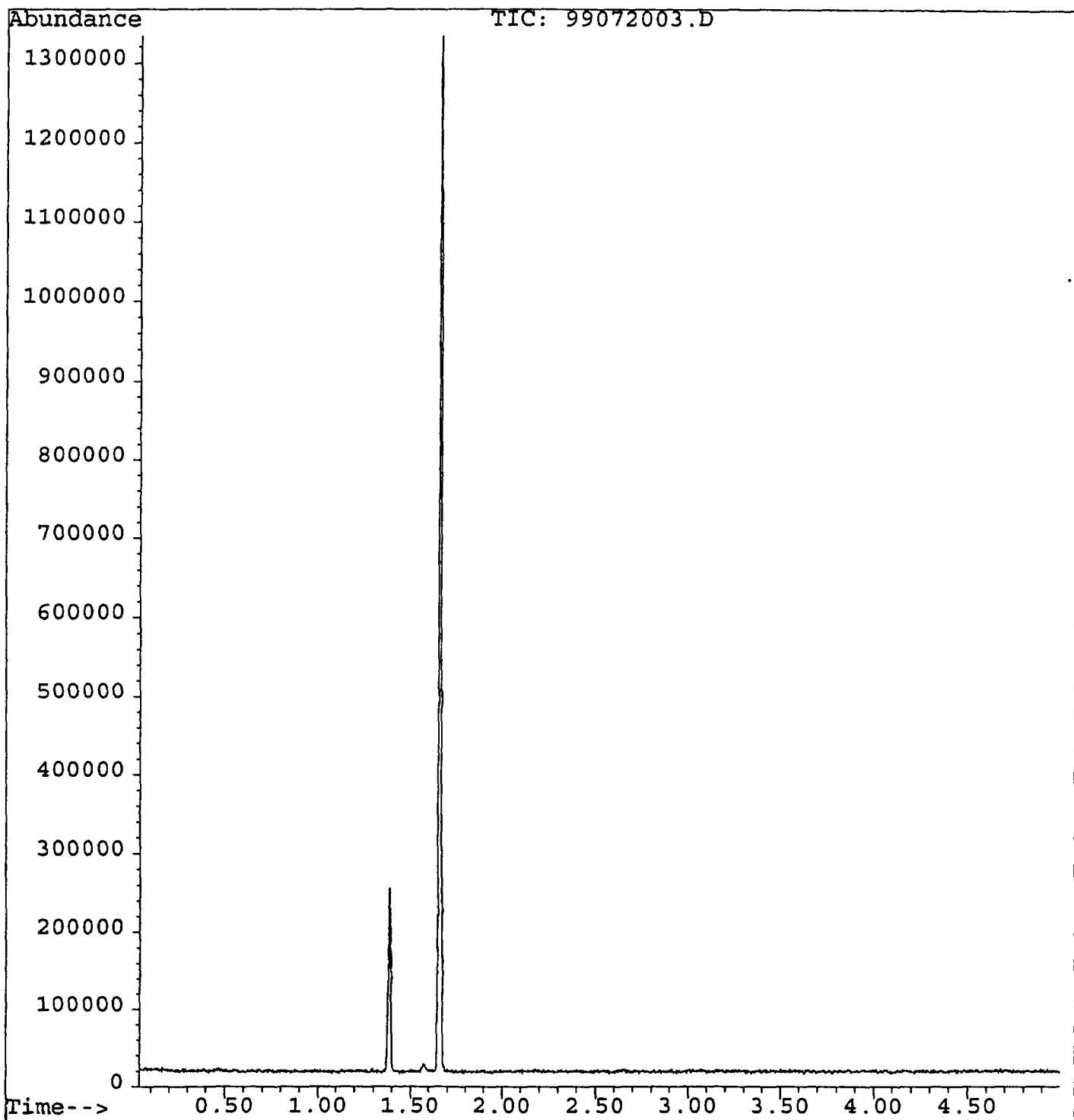


DC
7/21/99

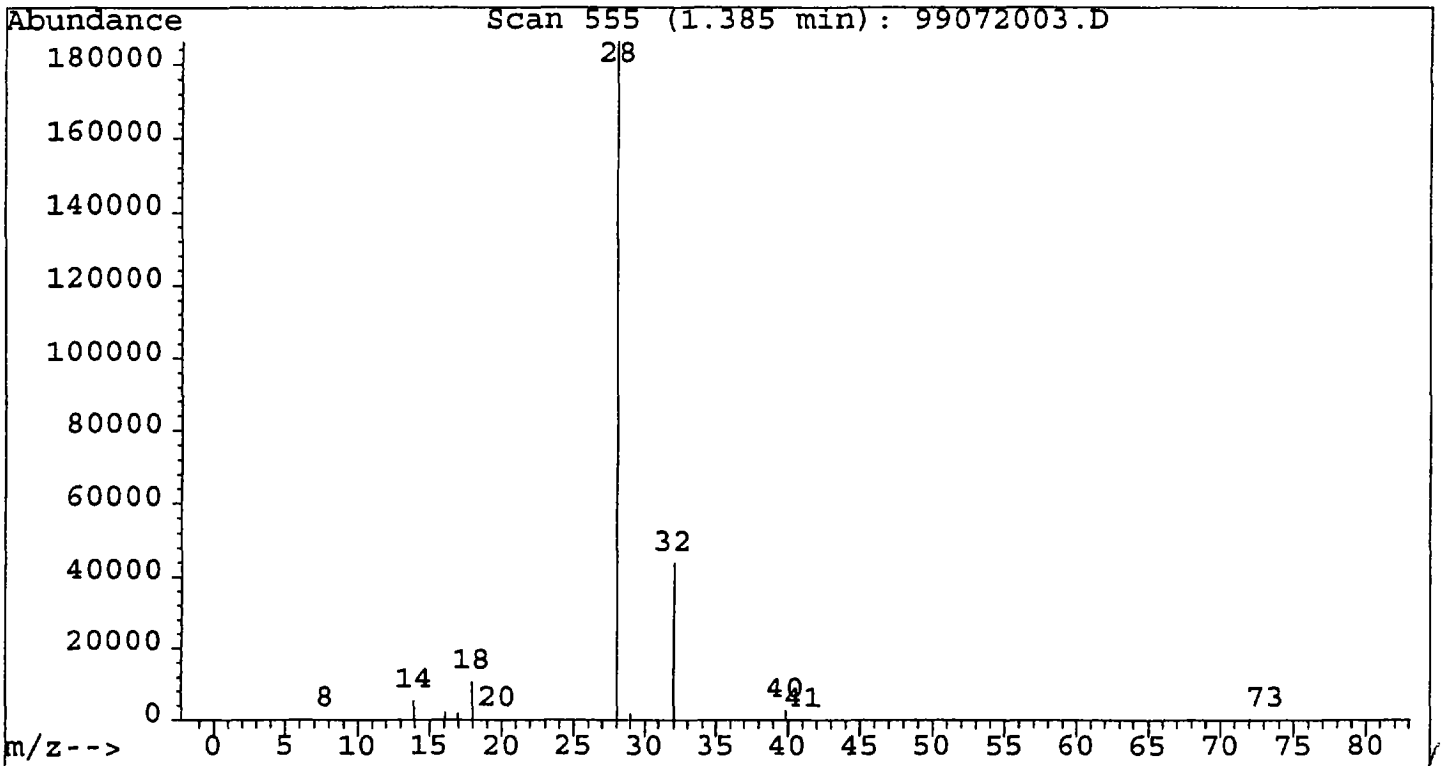
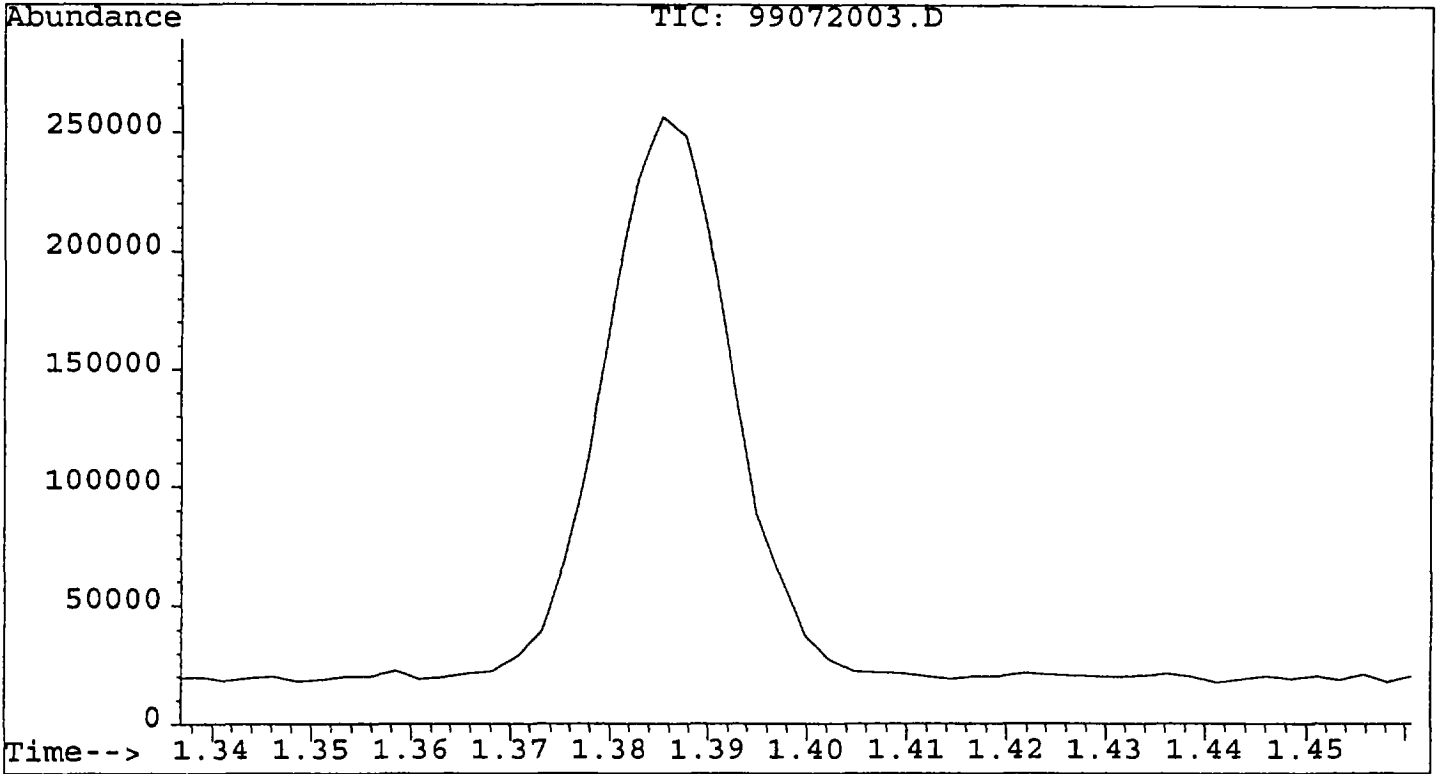
File : C:\HPCHEM\1\DATA\99072003.D
Operator : Bhavi
Acquired : 20 Jul 99 1:31 pm using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5682-12
Misc Info : 35 deg isothermal
Vial Number: 1



37

File : C:\HPCHEM\1\DATA\99072003.D
Operator : Bhavi
Acquired : 20 Jul 99 1:31 pm using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5682-12
Misc Info : 35 deg isothermal
Vial Number: 1

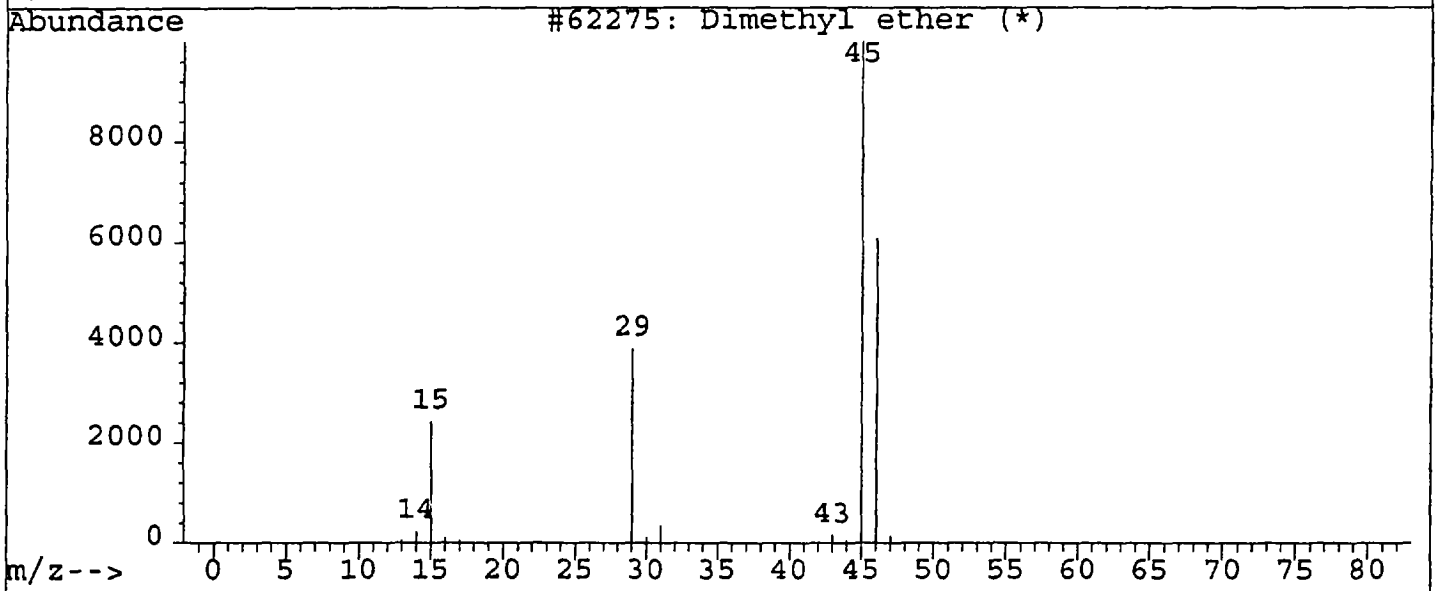
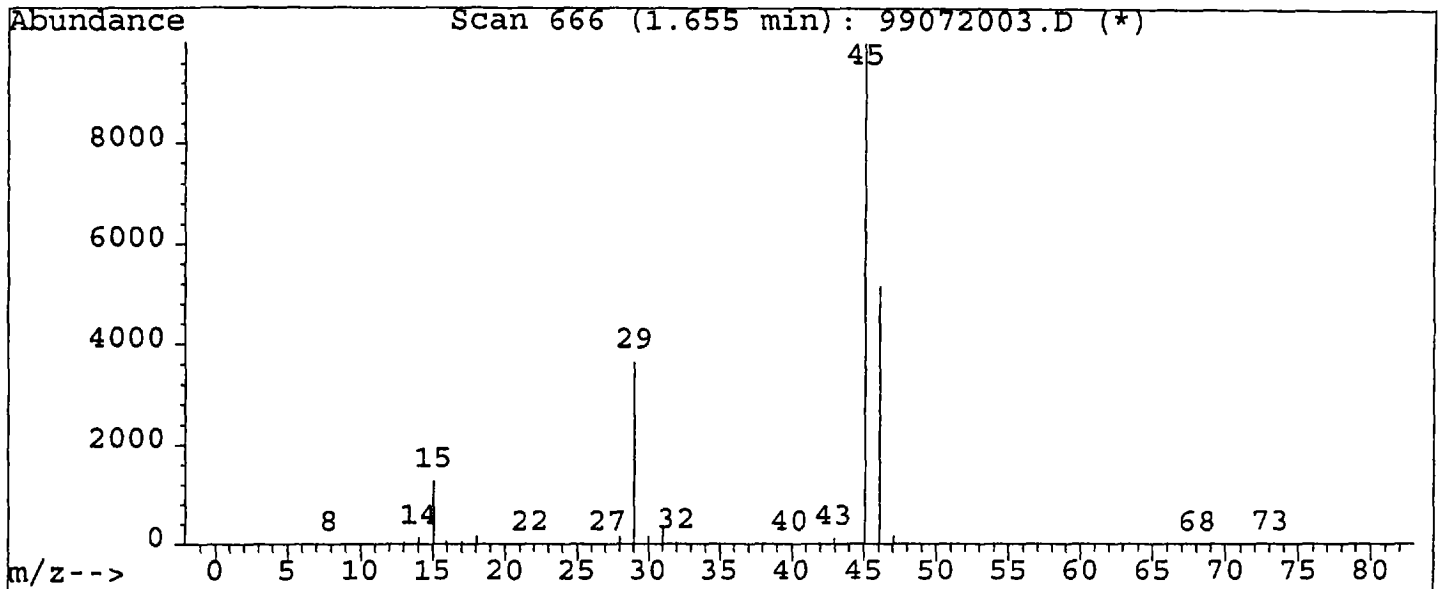
11-000-000-
Dc
7/21/99



30

Library Searched : C:\DATABASE\NBS75K.L
Quality : 91
ID : Dimethyl ether

11-00-0000
D
7/21/94



27

LABORATORY/COMPLIANCE SUMMARY

Sample Number:
99-860-5290

2. Laboratory Summary: Crazy Ribbon, Party Spray

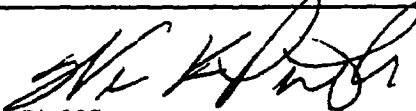
Flame Extension – 16CFR1500.45
Flame Extension was greater than 18 inches
Flash back occurred

Composition:

Major component was identified by GC/MS as Dimethyl Ether
Dimethyl Ether is a gas at room temperature and in this formula acts a a propellant and possibly as a solvent.
Dimethyl Ether has a reported Flash Point of -42°F (-41°C) [Langs Handbook of chemistry, 1956]

Original to: L. Blend FOWR ; **Copies to :** LSC, CE - Krivda

3. Name and Title



Date:

July 20, 1999

Warren K. Porter, Jr., Dir. LSC

4. Firm Name: _____ ; **Product:** _____

City, State: _____ ; **Model#:** _____

5. Compliance Assessment:

5. 11(c) Notice: Mfr/Imp.: _____ **Retailer** _____ **Other** _____

Original Records to: _____ ; **Copies:** _____

7. Name and Title:

8. Date:



LABORATORY REPORT	1. PRODUCT: Crazy Ribbon, Party Spray	2. SAMPLE NUMBERS: 99-860-5290
3. SEALS: Intact	4. DATE REC: 7/15/99	5. LABORATORY: LSC
6. SAMPLE DESCRIPTION: 12 units were received in plastic bags. Sample had the following information: "99-860-5290, Lori S. Person, 7/14/99".		
7. LABELING: N/A	8. CUSTOMS ENTRY NO: N/A	9. LOT/MODEL#:
10. PRODUCT DESCRIPTION: Crazy Ribbon, the product spray different color strings of materials, and is used at children's birthday parties.		
11. ANALYTICAL RESULTS:		
<p>Flammability 16 CFR 1500.45: When tested upright, all units showed flame extensions greater than 18 inches and flash back to the nozzle. In the inverted position, none of the units tested showed flashback or flame extensions. In the sideways position, some units showed flashback and flame extension greater than 18 inches, while others did not. See attached table.</p> <p>GC-MS: The aerosol propellant from subunits from each sample were analyzed by gas chromatography mass spectrometry (GC-MS). The major component detected in each sample is dimethyl ether. See attached GC-MS chromatographs and data sheets</p>		
12. RESERVE SAMPLE: Unused sample was sealed in container box and kept in storage room for warehouse pick up		
13a ANALYST SIGNATURE <i>[Signature]</i>	13b DATE 7/20/99	
14a CHECK ANALYST SIGNATURE	14b DATE	
15a REPORT CHECKED BY <i>[Signature]</i>	15b DATE 7/20/99	

[Handwritten mark]

**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5290-04	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-06	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5290-11	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-12	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-04	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-06	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-09	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-10	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-04	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-07	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
9-860-5292-11	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

Flammability Testing CFR 16 Section 1500.45

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5293-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-04	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5293-05	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-08	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-01	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-03	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-06	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-09	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

Note: All units tested upright had flame extension greater than 18 inches, and flash back to the nozzle.

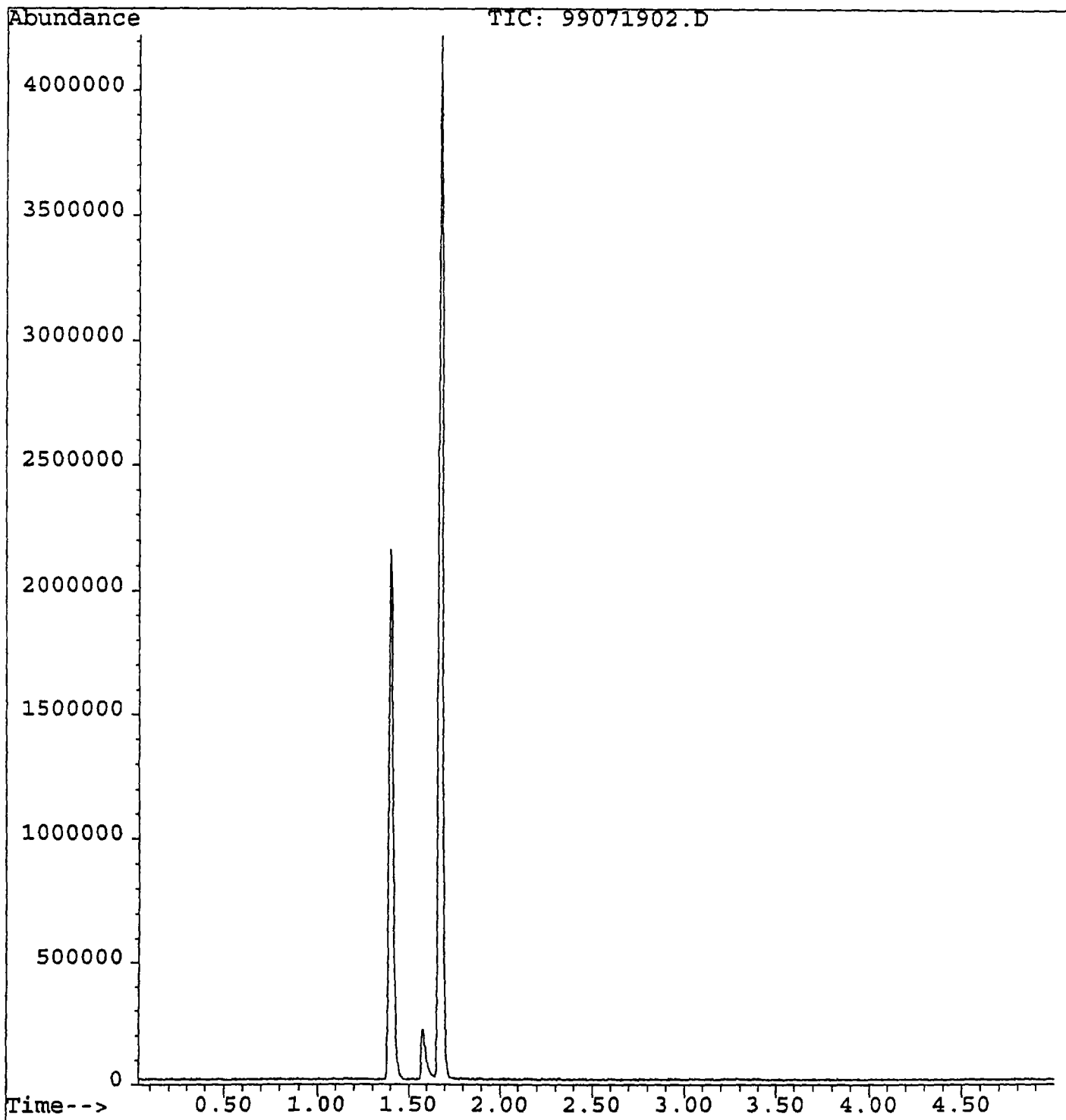
All units tested upside down extinguished the candle flame.

Units tested sideways yielded mixed results. Some units extinguished the candle flame immediately, other units had flame extensions greater than 18" and flash back for an extended time. Most units tested sideways had brief flame extensions, followed by extinguishment of candle flame.

41

99-860-5290
DC
7/20/99

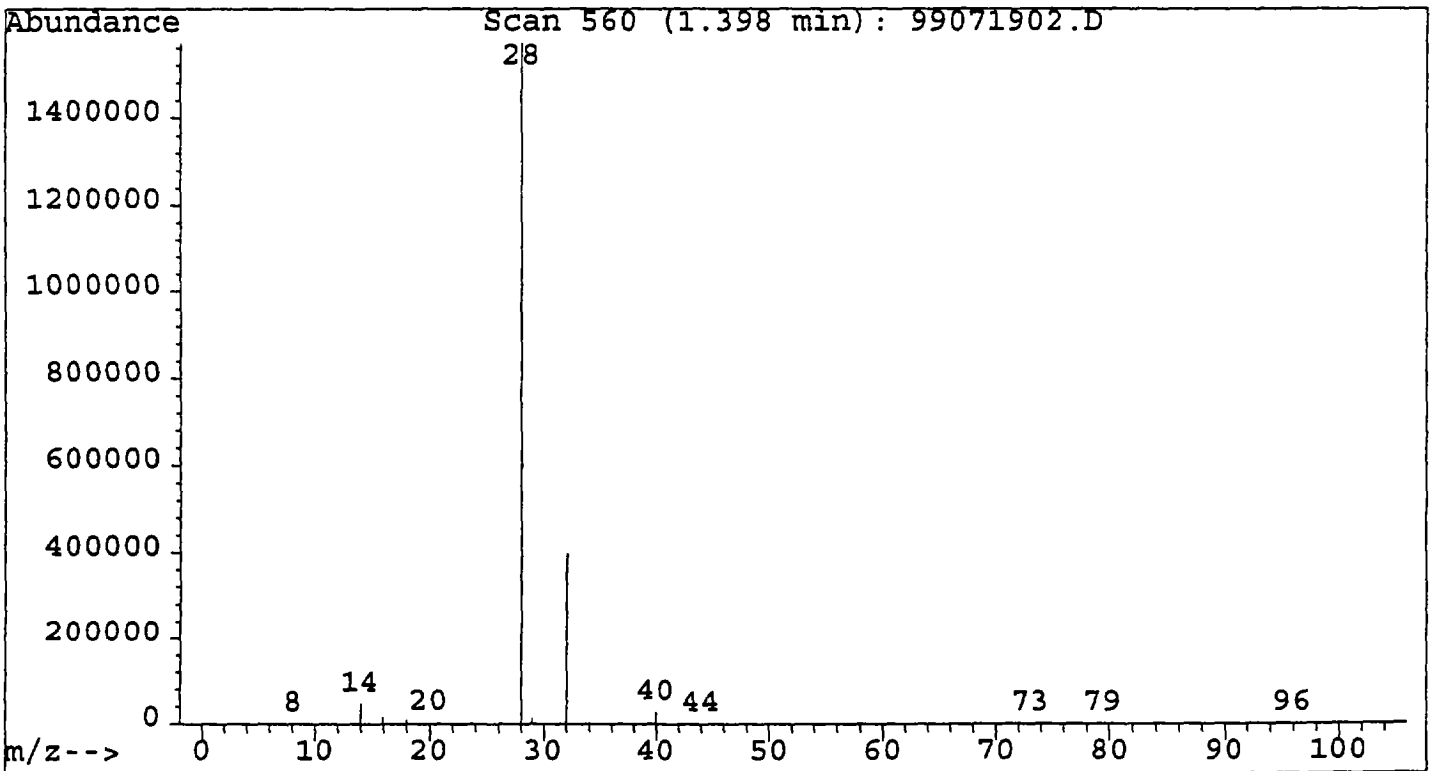
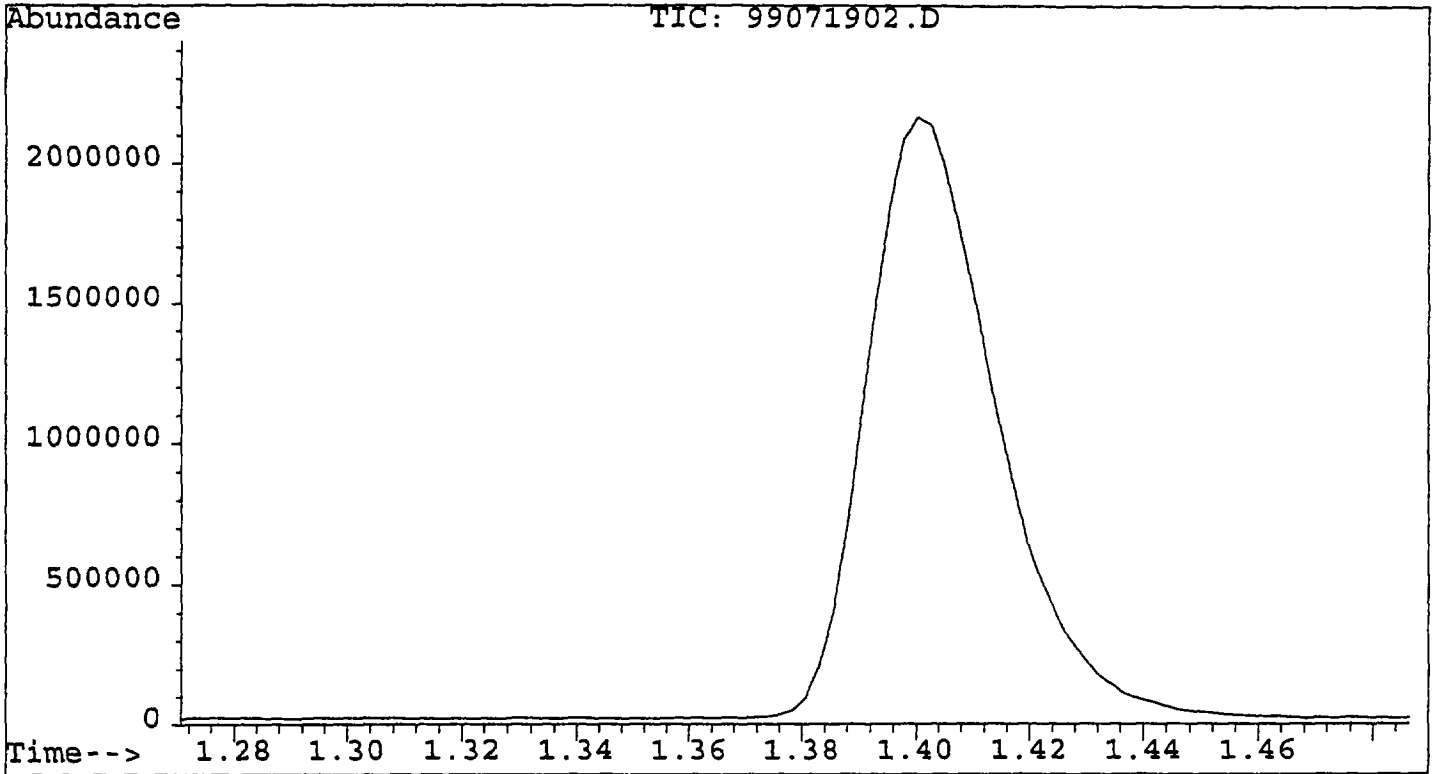
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Operator : Bhavi
Acquired : 19 Jul 99 8:32 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5290-06
Misc Info : 35 deg isothermal
Vial Number: 1



42

File : C:\HPCHEM\1\DATA\99071902.D
Operator : Bhavi
Acquired : 19 Jul 99 8:32 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5290-06
Misc Info : 35 deg isothermal
Vial Number: 1

99-860-5290
OC
7/20/99



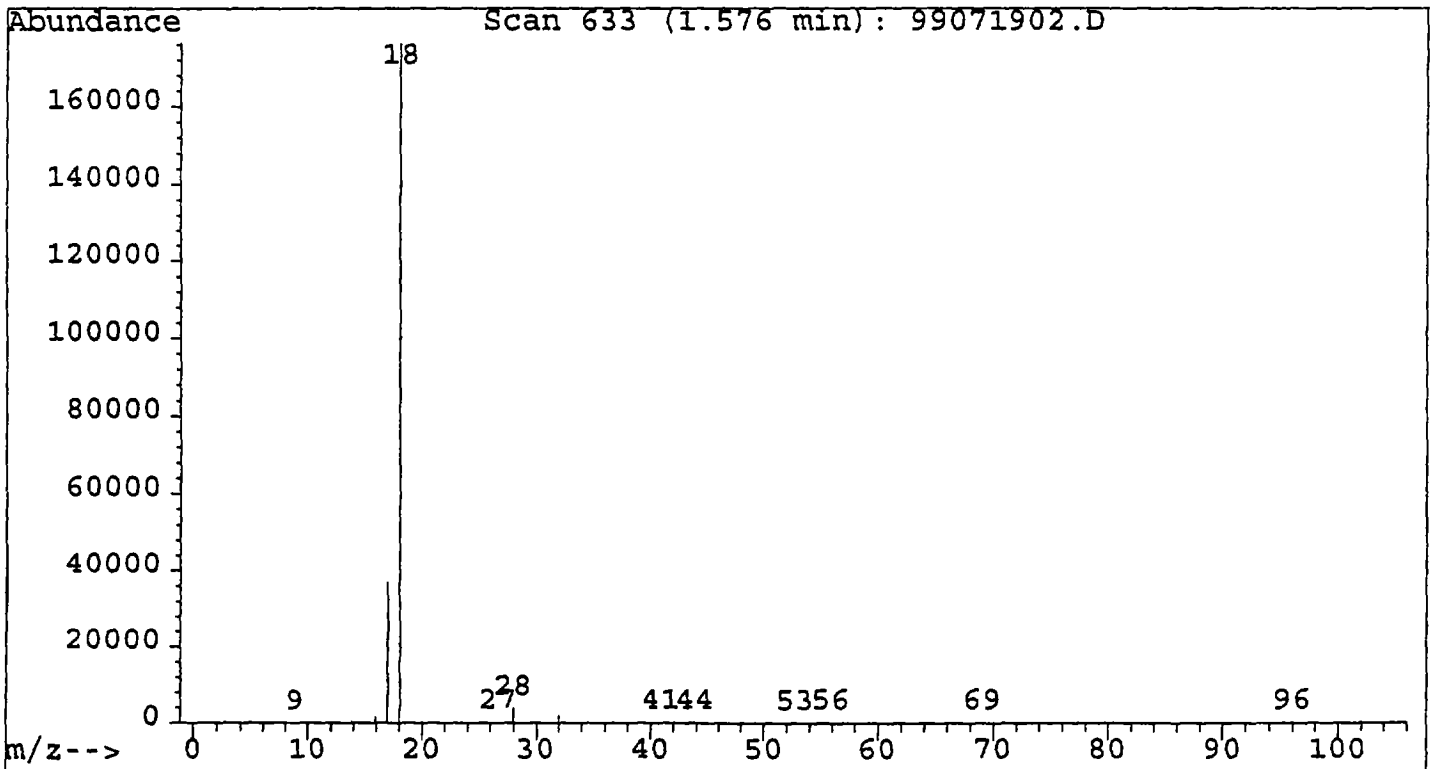
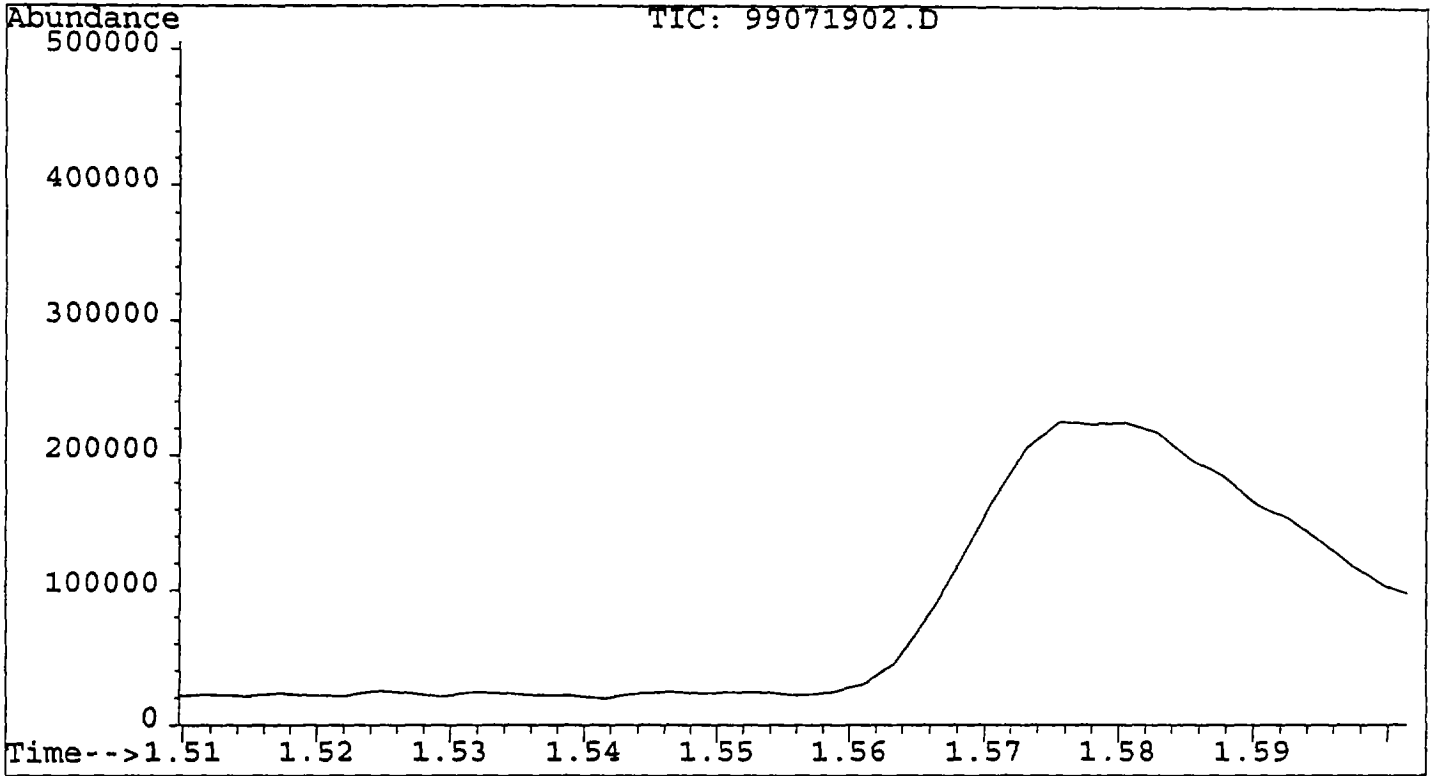
47

File : C:\HPCHEM\1\DATA\99071902.D
Operator : Bhavi
Acquired : 19 Jul 99 8:32 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5290-06
Misc Info : 35 deg isothermal
Vial Number: 1

99-860-5290

DL

7/20/99



44

99-860-5290

DC

7/16/99

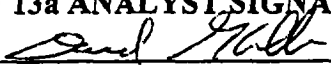

U.S. CONSUMER PRODUCT SAFETY COMMISSION



SEARCHED	INDEXED
99-860-5298	99-14-99
SIGNATURE	DATE
<i>Loel S. Pearson</i>	
PRINT NAME & TITLE (CPSC REPRESENTATIVE)	
<i>Loel S. Pearson, PST</i>	
SEAL BROKEN BY	
DC	
DATE	
7/16	

CPSC FORM 164

45

LABORATORY REPORT	1. PRODUCT: Crazy Ribbon, Party Spray	2. SAMPLE NUMBERS: 99-860-5291
3. SEALS: Intact	4. DATE REC: 7/15/99	5. LABORATORY: LSC
6. SAMPLE DESCRIPTION: 12 units were received in plastic bags. Sample had the following information: "99-860-5291, Lori S. Person, 7/14/99".		
7. LABELING: N/A	8. CUSTOMS ENTRY NO: N/A	9. LOT/MODEL#:
10. PRODUCT DESCRIPTION: Crazy Ribbon, the product spray different color strings of materials, and is used at children's birthday parties.		
11. ANALYTICAL RESULTS: <p>Flammability 16 CFR 1500.45: When tested upright, all units showed flame extensions greater than 18 inches and flash back to the nozzle. In the inverted position, none of the units tested showed flashback or flame extensions. In the sideways position, some units showed flashback and flame extension greater than 18 inches, while others did not. See attached table.</p> <p>GC-MS: The aerosol propellant from subunits from each sample were analyzed by gas chromatography mass spectrometry (GC-MS). The major component detected in each sample is dimethyl ether. See attached GC-MS chromatographs and data sheets</p>		
12. RESERVE SAMPLE: Unused sample was sealed in container box and kept in storage room for warehouse pick up		
13a ANALYST SIGNATURE 	13b DATE 7/20/99	
14a CHECK ANALYST SIGNATURE	14b DATE	
15a REPORT CHECKED BY 	15b DATE 7/20/99	

47

**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5290-04	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-06	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5290-11	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-12	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-04	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-06	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-09	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-10	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-04	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-07	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-11	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

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**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5293-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-04	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5293-05	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-08	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-01	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-03	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-06	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-09	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

Note: All units tested upright had flame extension greater than 18 inches, and flash back to the nozzle.

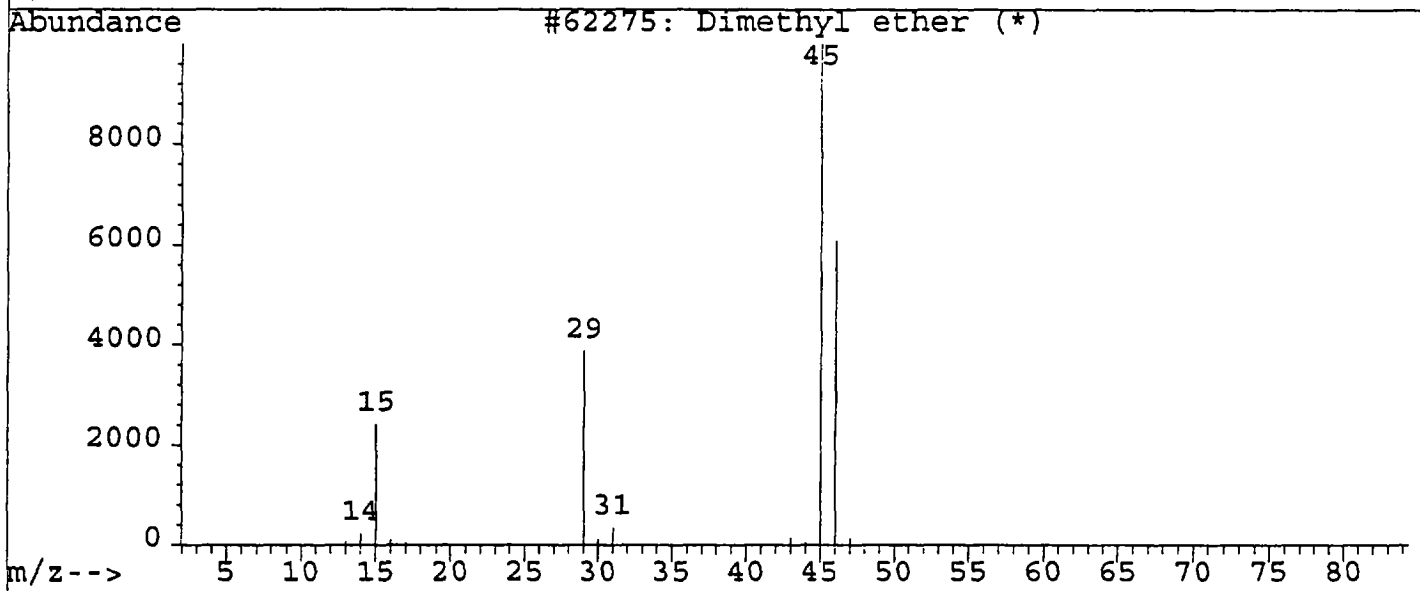
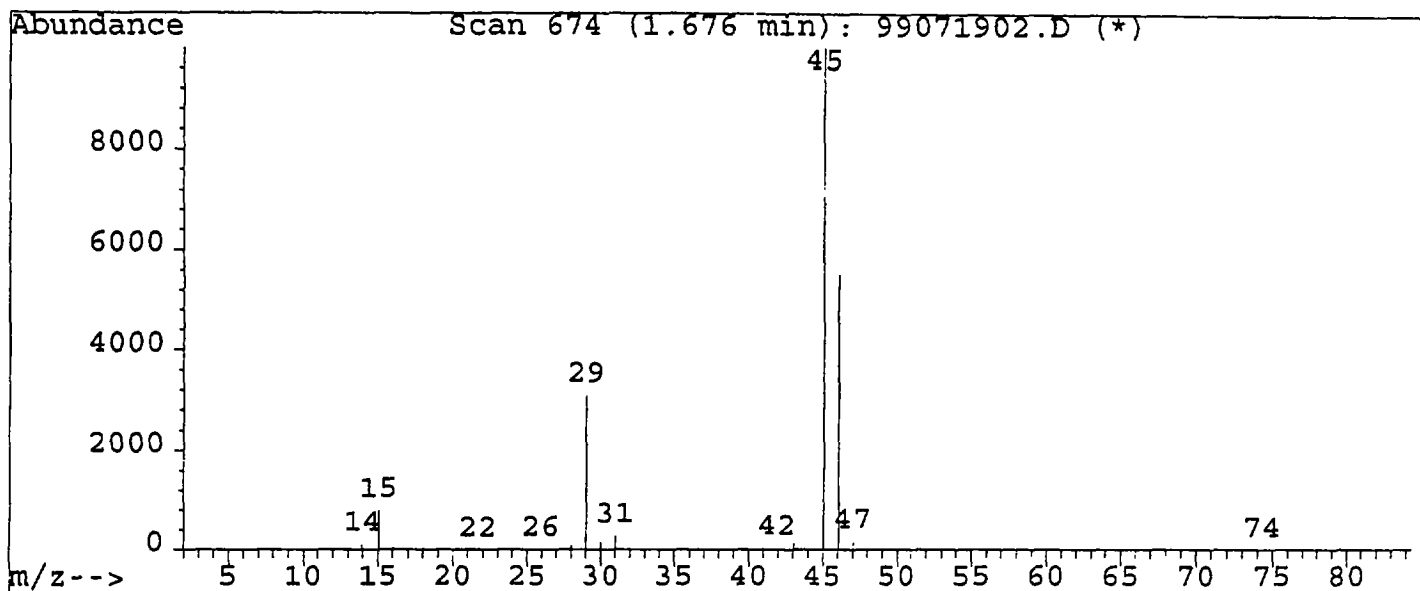
All units tested upside down extinguished the candle flame.

Units tested sideways yielded mixed results. Some units extinguished the candle flame immediately, other units had flame extensions greater than 18" and flash back for an extended time. Most units tested sideways had brief flame extensions, followed by extinguishment of candle flame.

49

Library Searched : C:\DATABASE\NBS75K.L
Quality : 83
ID : Dimethyl ether

99-840-241
DL
7/2/99



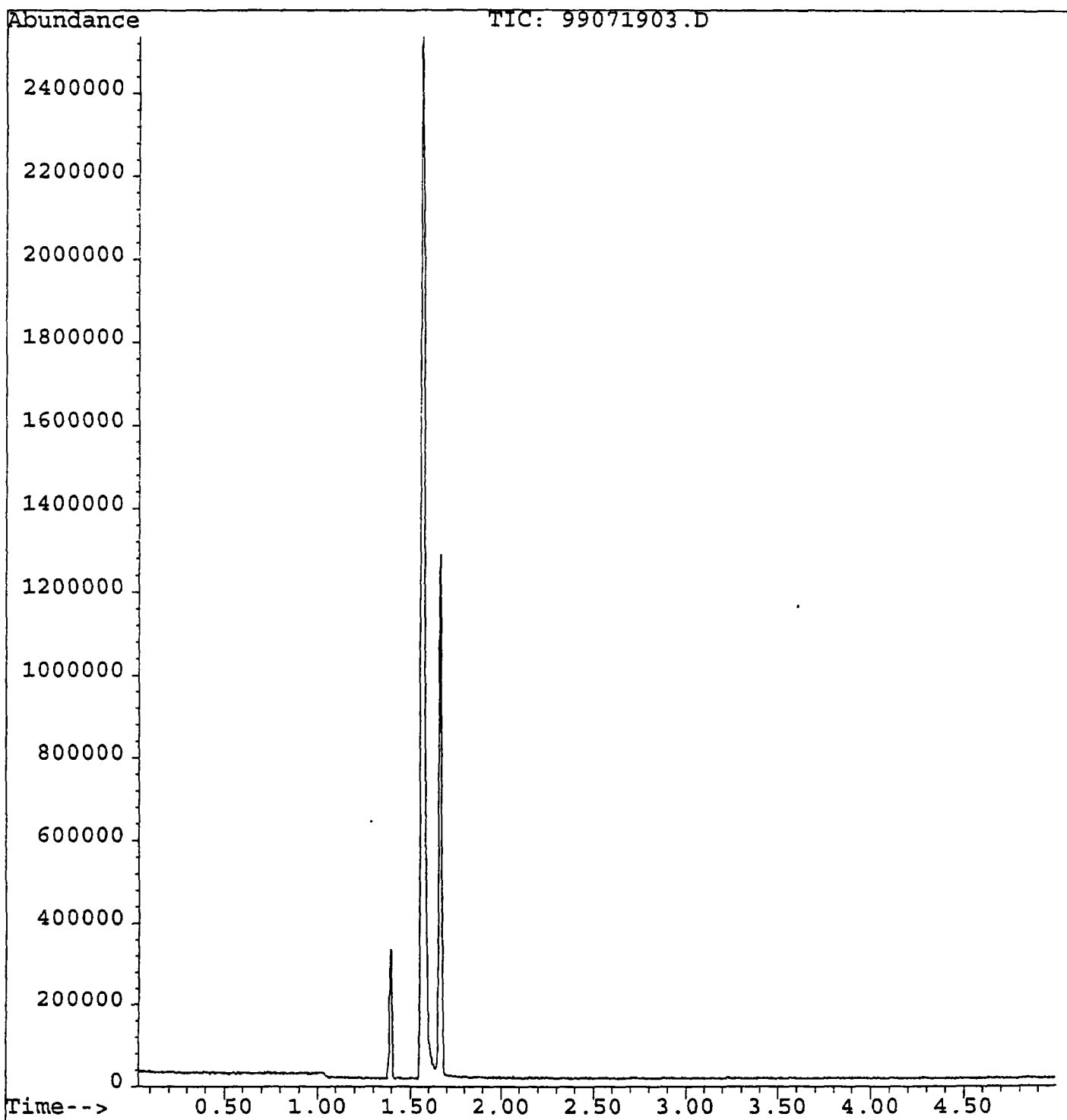
50

99-860-5d41

DC

7/20/99

File : C:\HPCHEM\1\DATA\99071903.D
Operator : Bhavi
Acquired : 19 Jul 99 9:07 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5290-10
Misc Info : 35 deg isothermal
Vial Number: 1



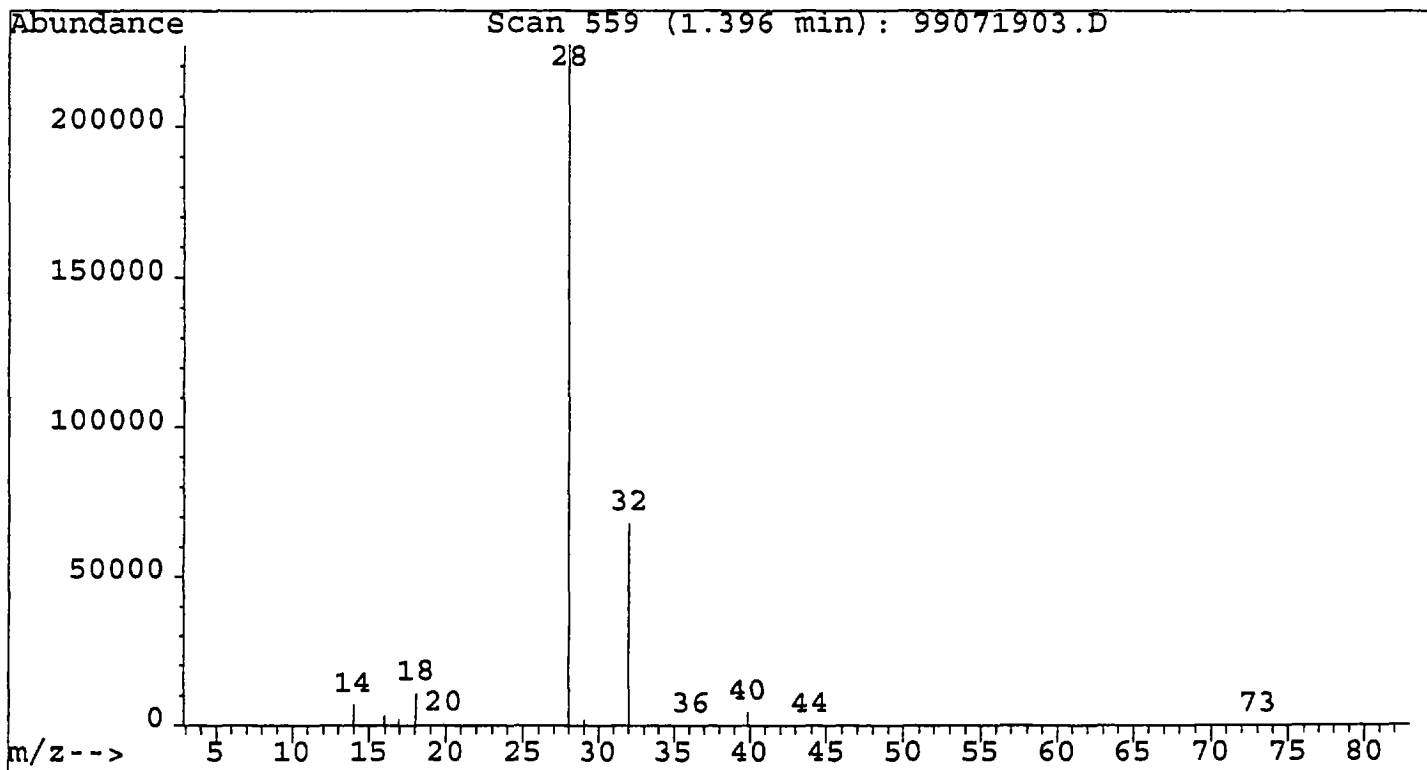
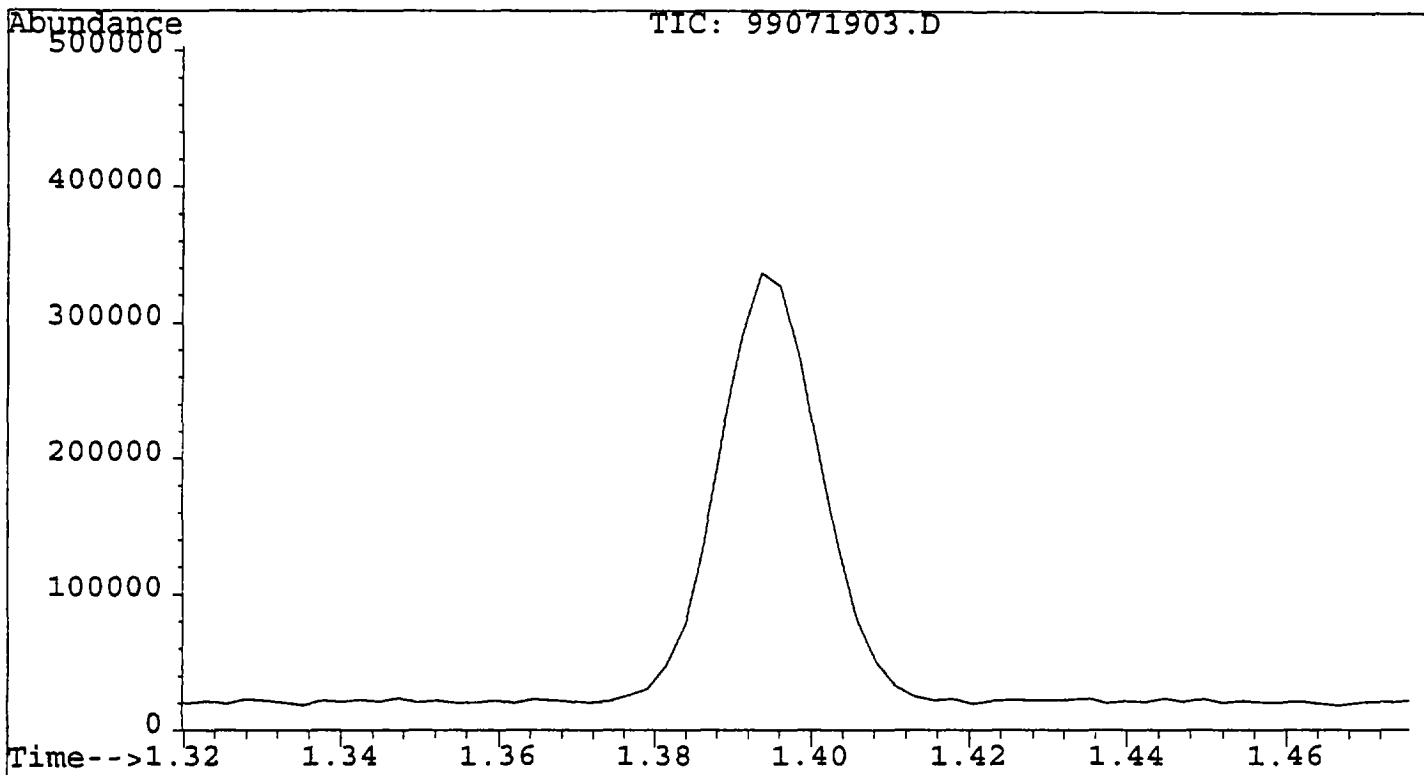
51

99-860-5291

DC

7/20/99

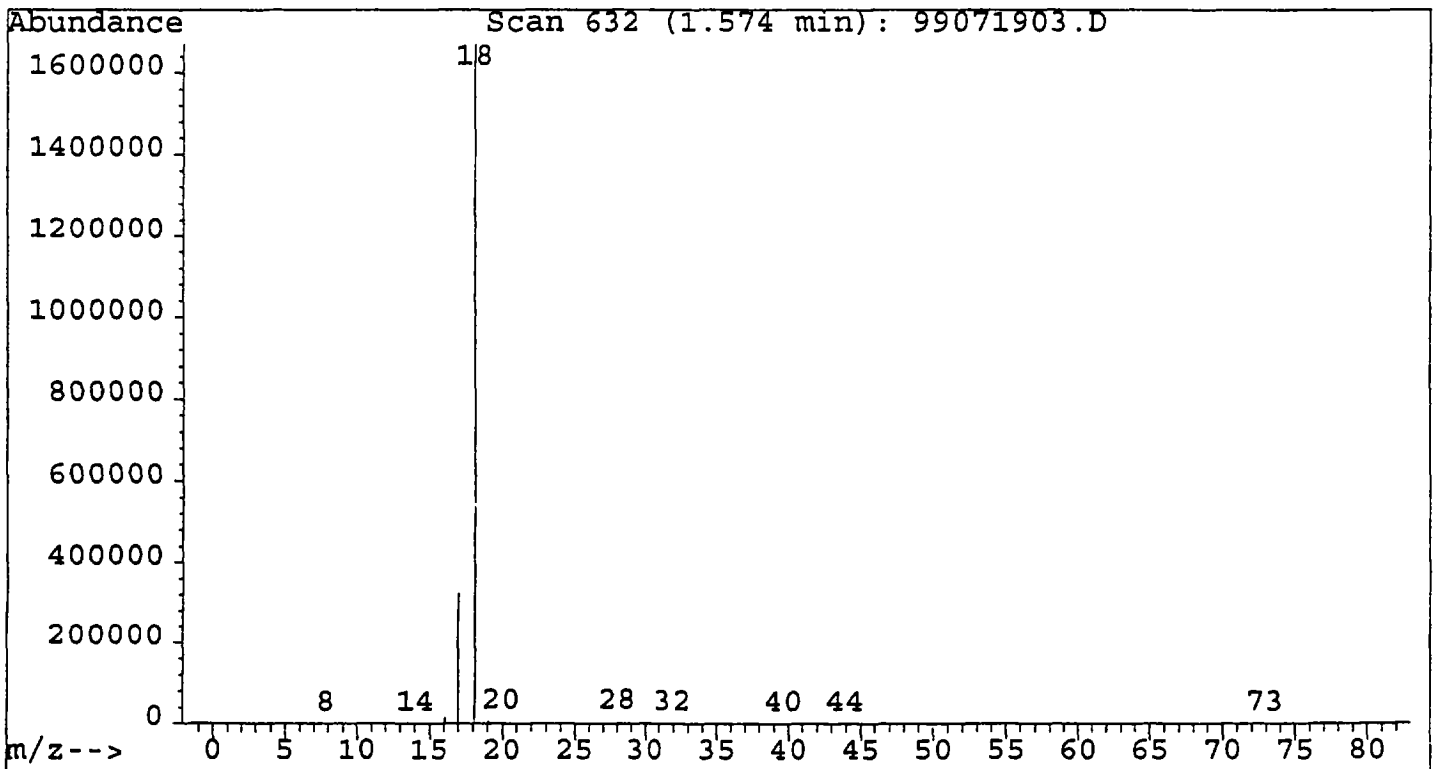
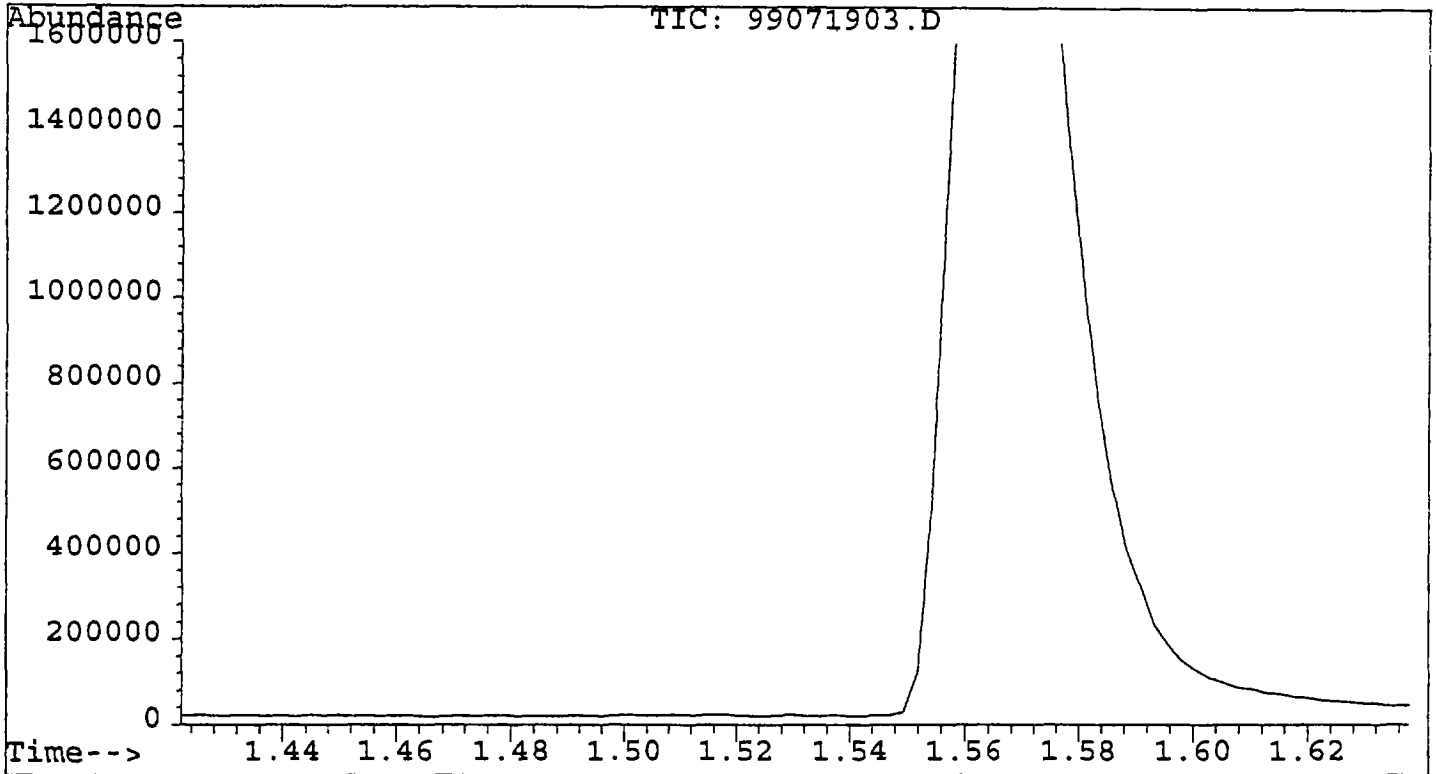
File : C:\HPCHEM\1\DATA\99071903.D
Operator : Bhavi
Acquired : 19 Jul 99 9:07 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5290-10
Misc Info : 35 deg isothermal
Vial Number: 1



52

File : C:\HPCHEM\1\DATA\99071903.D
Operator : Bhavi
Acquired : 19 Jul 99 9:07 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5290-10
Misc Info : 35 deg isothermal
Vial Number: 1

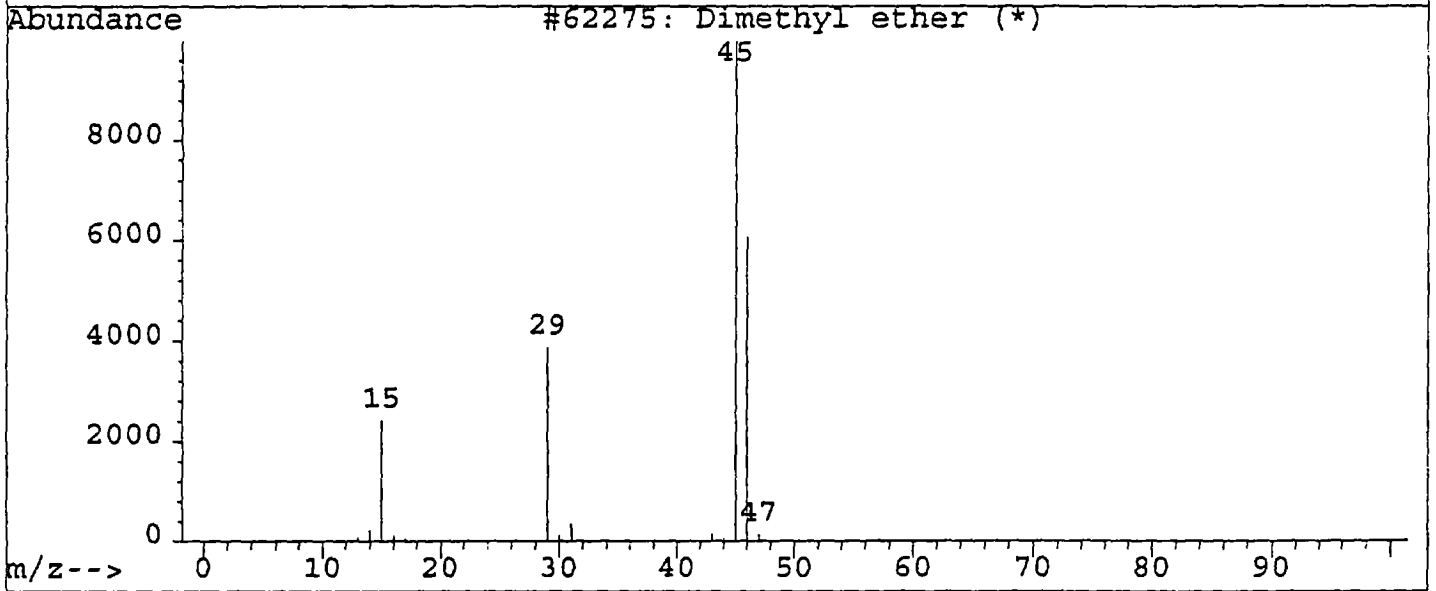
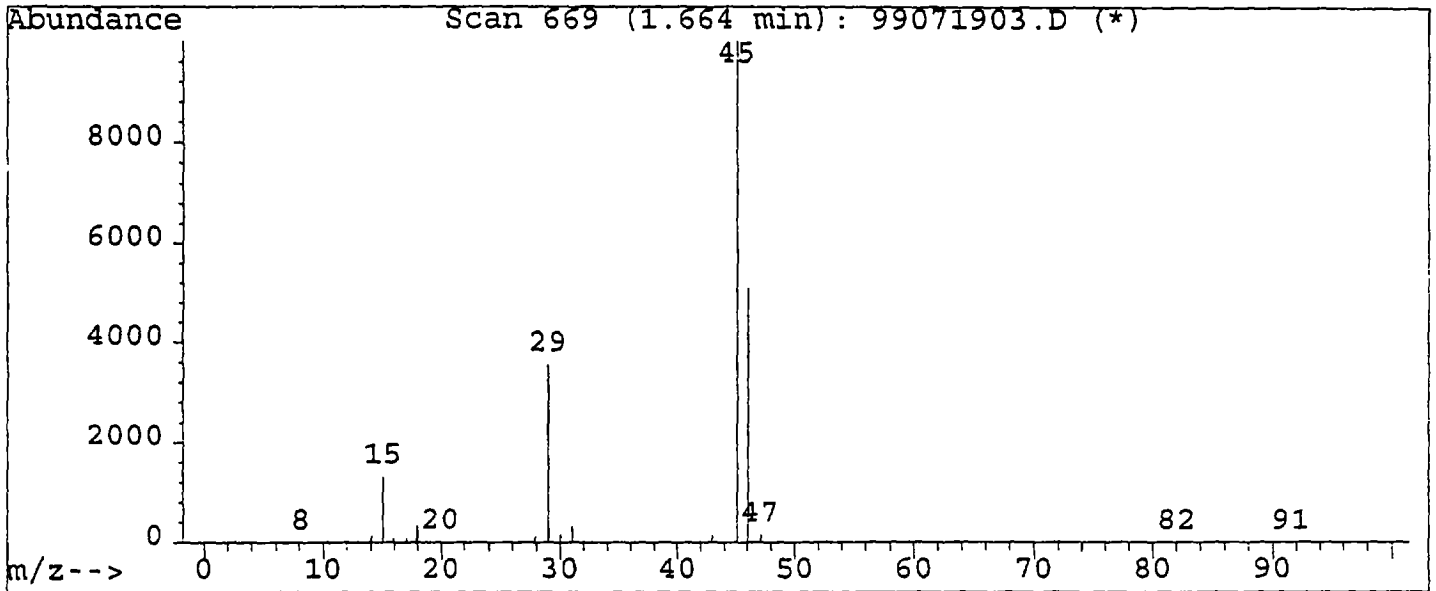
99-860-5291
DC
7/19/99



57

99-860-511
D
7/20/99


Library Searched : C:\DATABASE\NBS75K.L
Quality : 91
ID : Dimethyl ether



54

99-860-5071
DC
7/16/99

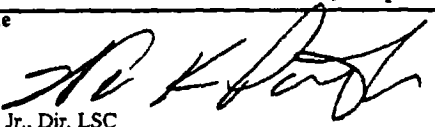
U.S. CONSUMER PRODUCT SAFETY COMMISSION



SAMPLE NO. 860-5291	DATE 7-14-99
SIGNATURE <i>[Signature]</i>	
PRINT NAME & TITLE (CPSC REPRESENTATIVE) Doris Deacon Lab. S. Person, 1st	
SEAL BROKEN BY <i>[Signature]</i>	
DATE 7/14/99	

CPSC FORM 104

55

LABORATORY/COMPLIANCE SUMMARY		Sample Number: 99-860-5292			
2. Laboratory Summary: Crazy Ribbon, Party Spray					
Flame Extension – 16CFR1500.45 Flame Extension was greater than 18 inches Flash back occurred Composition: Major component was identified by GC/MS as Dimethyl Ether Dimethyl Ether is a gas at room temperature and in this formula acts a a propellant and possibly as a solvent. Dimethyl Ether has a reported Flash Point of -42°F (-41°C) [Langs Handbook of chemistry, 1956]					
Original to: L. Blend FOWR ; Copies to : LSC, CE - Krivda					
3. Name and Title		Date:			
 Warren K. Porter, Jr., Dir. LSC		July 20, 1999			
4. Firm Name: _____ ; Product: _____					
City, State: _____ ; Model#: _____					
5. Compliance Assessment:					
<table border="0"> <tr> <td>5. 11(c) Notice: Mfr/Imp.:</td> <td>Retailer</td> <td>Other</td> </tr> </table>			5. 11(c) Notice: Mfr/Imp.:	Retailer	Other
5. 11(c) Notice: Mfr/Imp.:	Retailer	Other			
Original Records to:		; Copies:			
7. Name and Title:		8. Date:			

56

LABORATORY REPORT	1. PRODUCT: Crazy Ribbon, Party Spray	2. SAMPLE NUMBERS: 99-860-5292
3. SEALS: Intact	4. DATE REC: 7/15/99	5. LABORATORY: LSC
6. SAMPLE DESCRIPTION: 12 units were received in plastic bags. Sample had the following information: "99-860-5292, Lori S. Person, 7/14/99".		
7. LABELING: N/A	8. CUSTOMS ENTRY NO: N/A	9. LOT/MODEL#:
10. PRODUCT DESCRIPTION: Crazy Ribbon, the product spray different color strings of materials, and is used at children's birthday parties.		
11. ANALYTICAL RESULTS: <p>Flammability 16 CFR 1500.45: When tested upright, all units showed flame extensions greater than 18 inches and flash back to the nozzle. In the inverted position, none of the units tested showed flashback or flame extensions. In the sideways position, some units showed flashback and flame extension greater than 18 inches, while others did not. See attached table.</p> <p>GC-MS: The aerosol propellant from subunits from each sample were analyzed by gas chromatography mass spectrometry (GC-MS). The major component detected in each sample is dimethyl ether. See attached GC-MS chromatographs and data sheets</p>		
12. RESERVE SAMPLE: Unused sample was sealed in container box and kept in storage room for warehouse pick up		
13a ANALYST SIGNATURE <i>[Signature]</i>	13b DATE 7/20/99	
14a CHECK ANALYST SIGNATURE	14b DATE	
15a REPORT CHECKED BY <i>[Signature]</i>	15b DATE 7/20/99	

57

**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5290-04	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-06	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5290-11	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-12	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-04	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-06	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-09	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-10	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-04	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-07	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-11	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

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Flammability Testing CFR 16 Section 1500.45

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5293-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-04	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5293-05	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-08	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-01	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-03	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-06	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-09	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

Note: All units tested upright had flame extension greater than 18 inches, and flash back to the nozzle.

|| units tested upside down extinguished the candle flame.

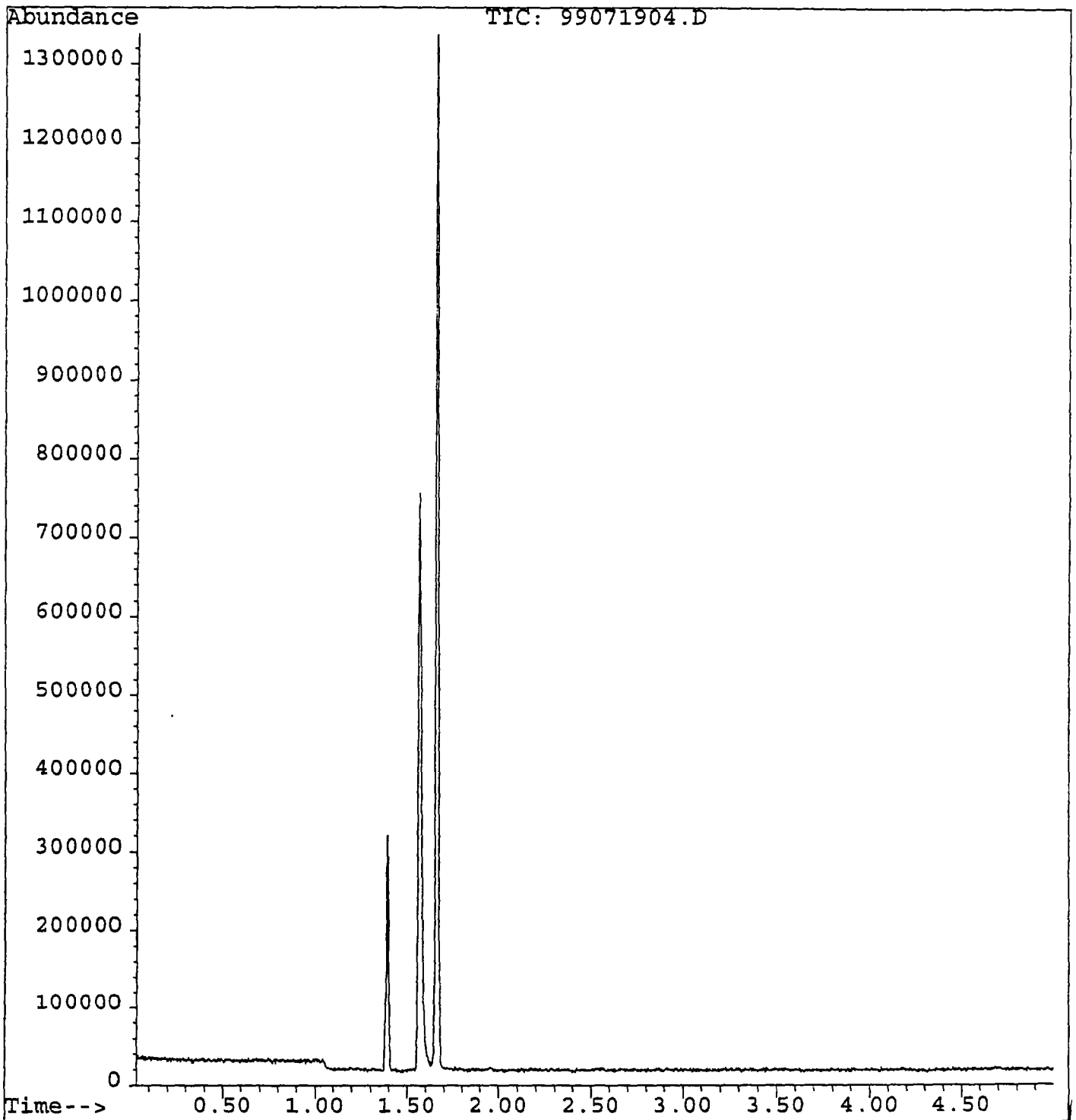
units tested sideways yielded mixed results. Some units extinguished the candle flame immediately, other units had flame extensions greater than 18" and flash back for an extended time. Most units tested sideways had brief flame extensions, followed by extinguishment of candle flame.

99-860-5292

DL

7/20/99

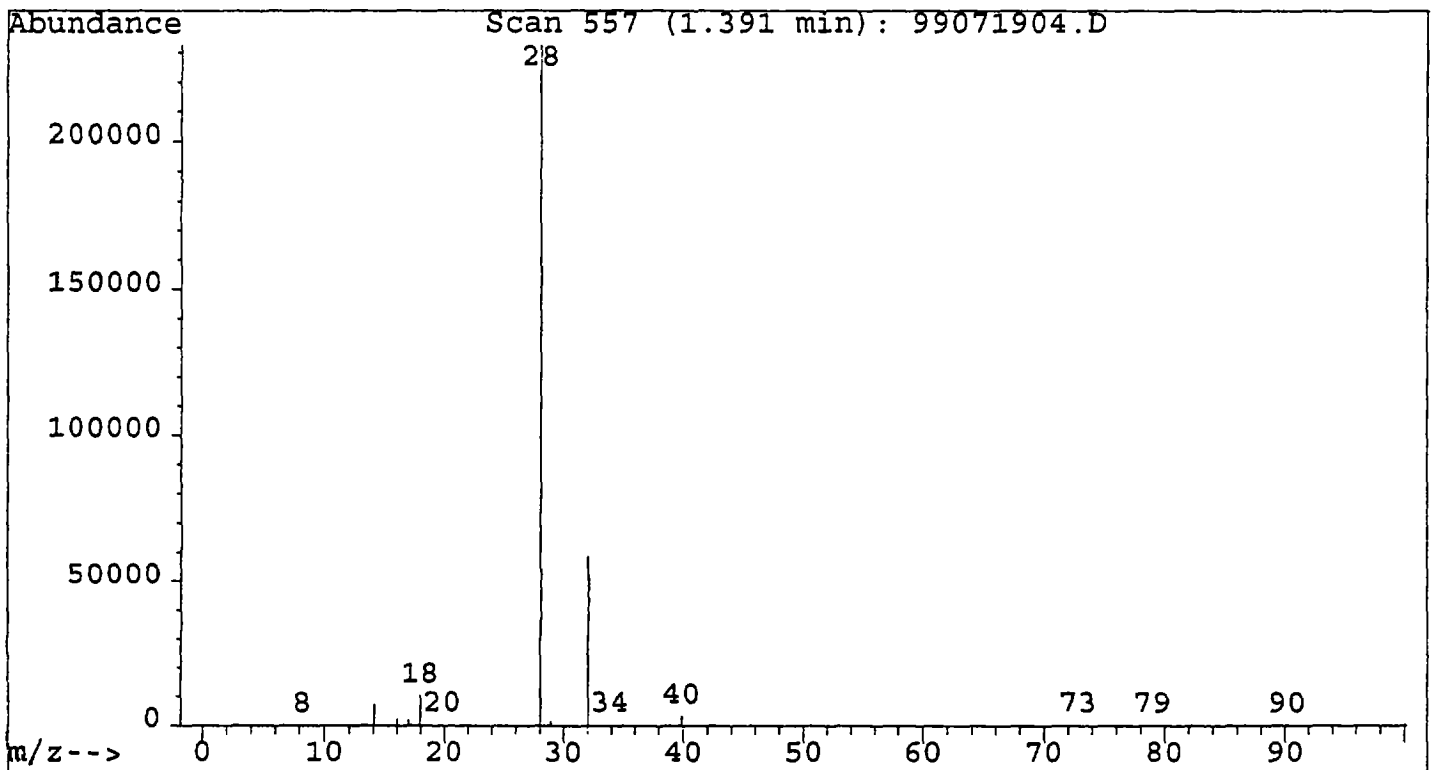
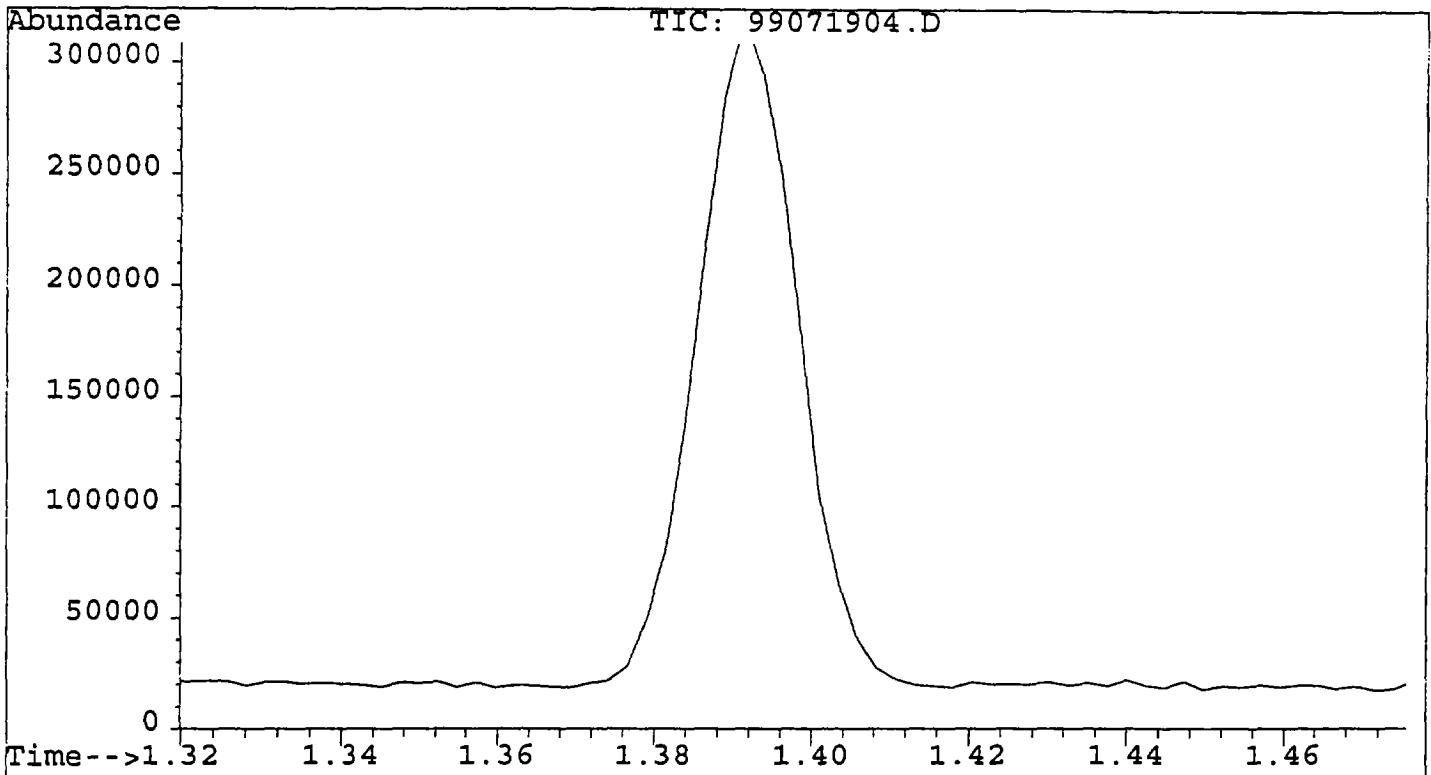
File : C:\HPCHEM\1\DATA\99071904.D
Operator : Bhavi
Acquired : 19 Jul 99 9:28 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5292-01
Misc Info : 35 deg isothermal
Vial Number: 1



60

File : C:\HPCHEM\1\DATA\99071904.D
Operator : Bhavi
Acquired : 19 Jul 99 9:28 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5292-01
Misc Info : 35 deg isothermal
Vial Number: 1

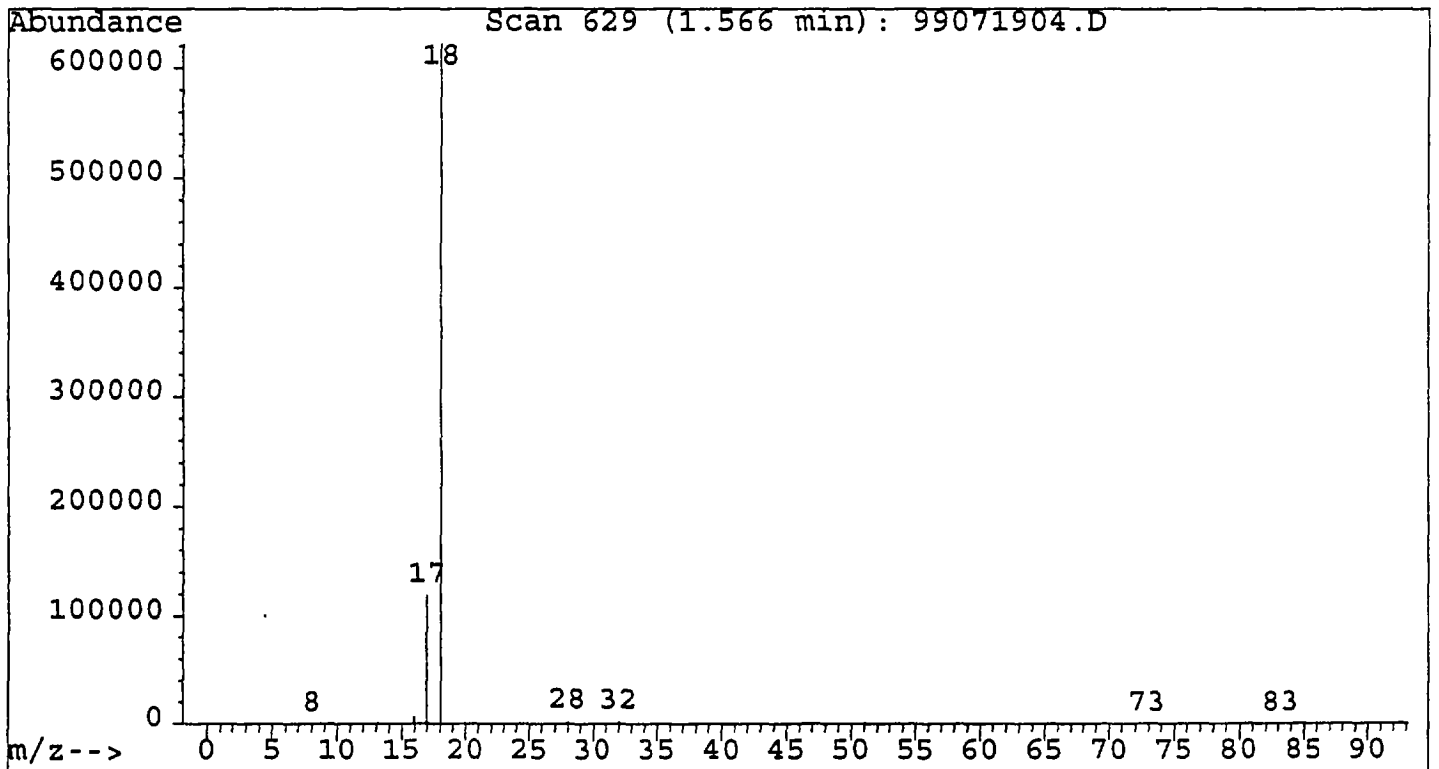
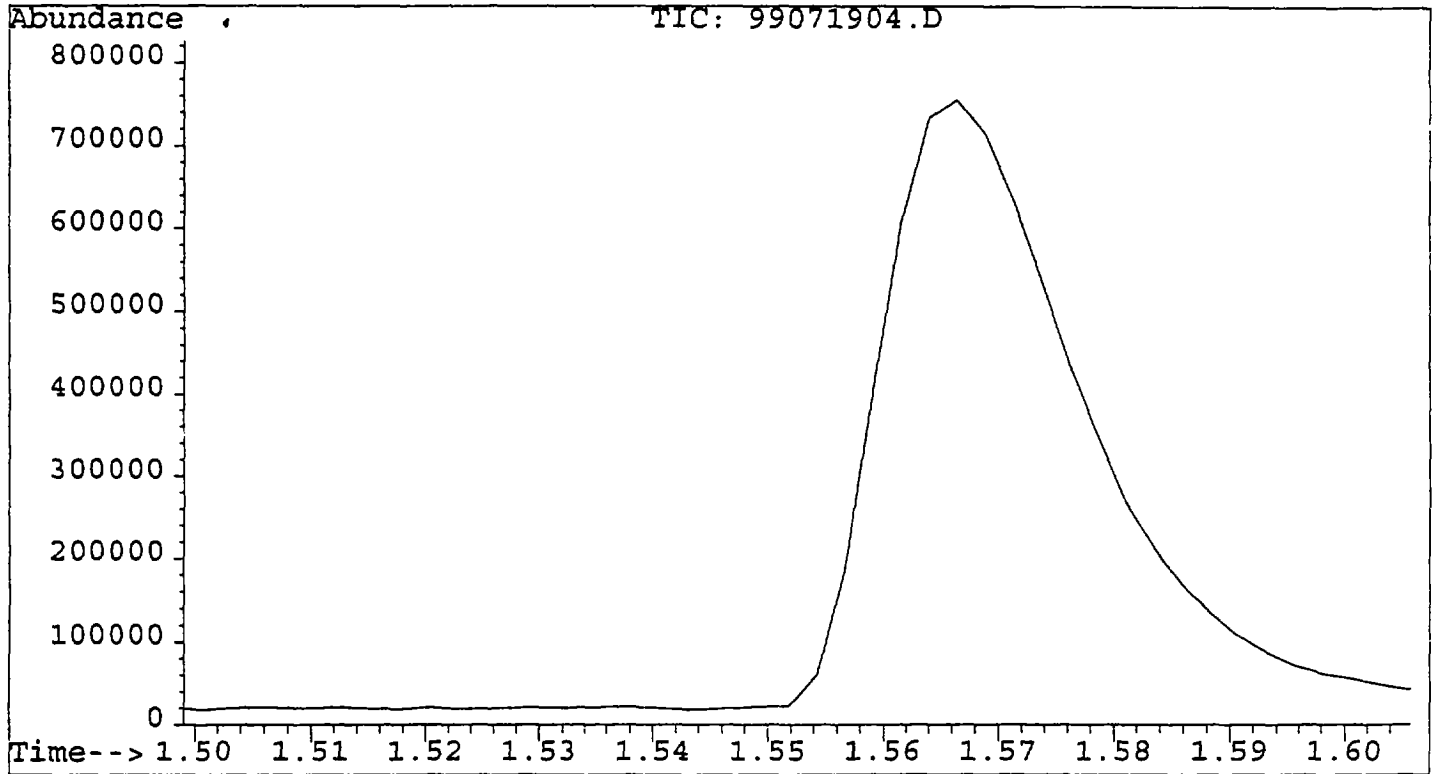
99-860-5292
DC
7/20/99



61

99-860-5292
DC
7/20/99

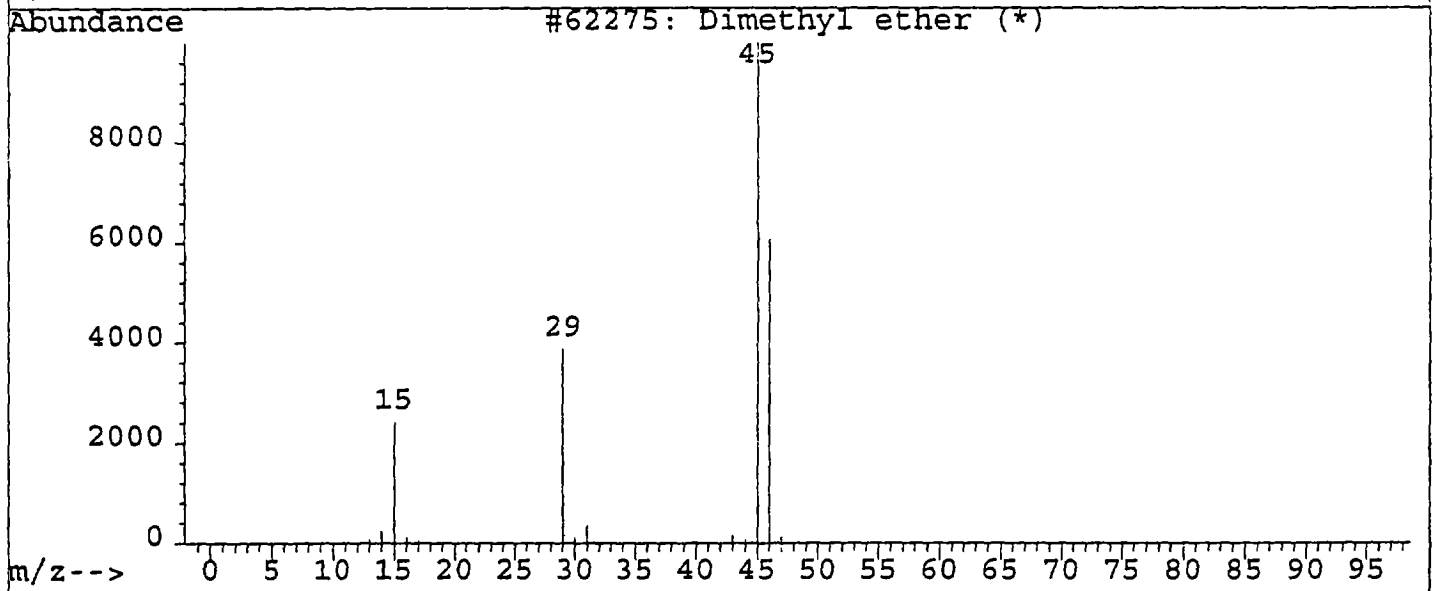
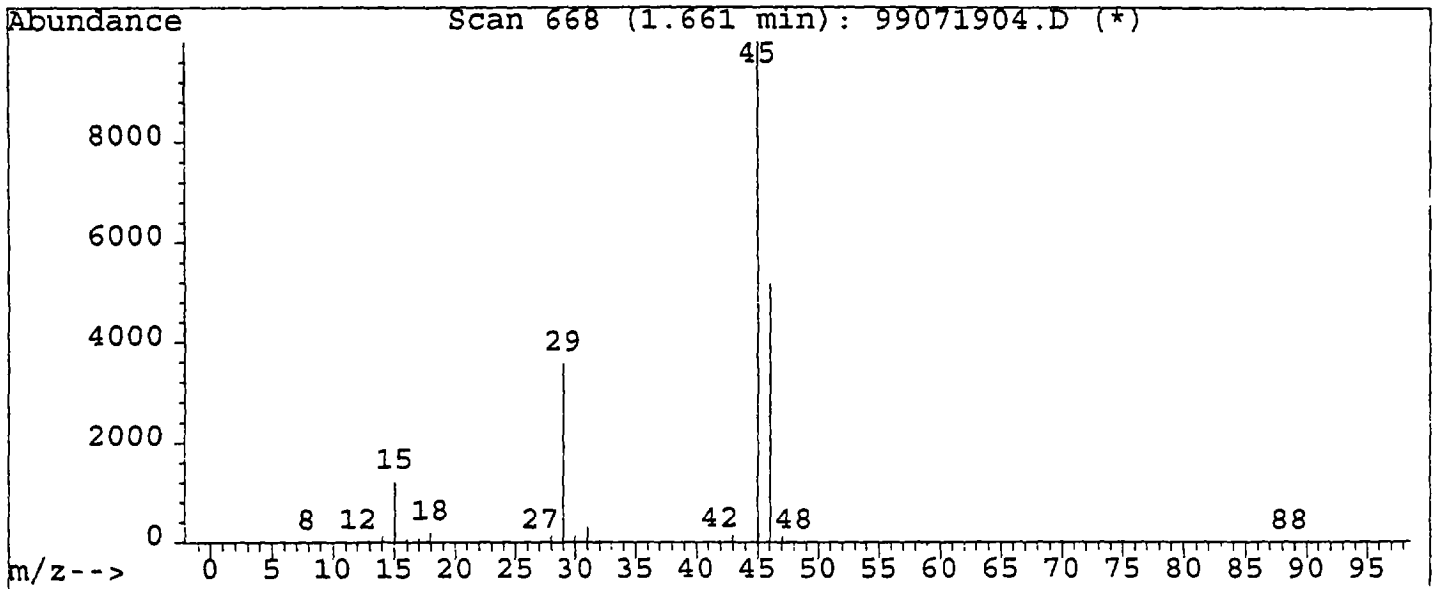
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Operator : Bhavi
Acquired : 19 Jul 99 9:28 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5292-01
Misc Info : 35 deg isothermal
Vial Number: 1



62 ✓


Library Searched : C:\DATABASE\NBS75K.L
Quality : 91
ID : Dimethyl ether

77-860-5-11
DL
7/2/99



67

99-860-5072
DC
7/16/99

 MISSOURI	
STAMP NO. 99-860-5292	DATE 7-14-99
SIGNATURE Doris Pearson	
PRINT NAME & TITLE (SEE INSTRUCTIONS) Doris Pearson, PSI	
SEAL BROKEN BY DC	
DATE 7/16/99	

CPSC FORM 184

69

LABORATORY/COMPLIANCE SUMMARY

Sample Number:
99-860-5293

2. Laboratory Summary: Crazy Ribbon, Party Spray

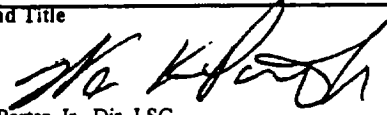
Flame Extension – 16CFR1500.45
Flame Extension was greater than 18 inches
Flash back occurred

Composition:

Major component was identified by GC/MS as Dimethyl Ether
Dimethyl Ether is a gas at room temperature and in this formula acts a a propellant and possibly as a solvent.
Dimethyl Ether has a reported Flash Point of -42°F (-41°C) [Langs Handbook of chemistry, 1956]

Original to: L. Blend FOWR ; **Copies to :** LSC, CE - Krivda

3. Name and Title



Date:

July 20, 1999

Warren K. Porter, Jr., Dir. LSC

4. Firm Name: _____ ; **Product:** _____

City, State: _____ ; **Model#:** _____

5. Compliance Assessment:



5. 11(c) Notice: Mfr/Imp.: _____ **Retailer** _____ **Other** _____

Original Records to: _____ ; **Copies:** _____

7. Name and Title:

8. Date:



LABORATORY REPORT		1. PRODUCT: Crazy Ribbon, Party Spray	2. SAMPLE NUMBERS: 99-860-5293
3. SEALS: Intact	4. DATE REC: 7/15/99		5. LABORATORY: LSC
6. SAMPLE DESCRIPTION: 12 units were received in plastic bags. Sample had the following information: "99-860-5293, Lori S. Person, 7/14/99".			
7. LABELING: N/A	8. CUSTOMS ENTRY NO: N/A		9. LOT/MODEL#:
10. PRODUCT DESCRIPTION: Crazy Ribbon, the product spray different color strings of materials, and is used at children's birthday parties.			
11. ANALYTICAL RESULTS:			
<p>Flammability 16 CFR 1500.45: When tested upright, all units showed flame extensions greater than 18 inches and flash back to the nozzle. In the inverted position, none of the units tested showed flashback or flame extensions. In the sideways position, some units showed flashback and flame extension greater than 18 inches, while others did not. See attached table.</p> <p>GC-MS: The aerosol propellant from subunits from each sample were analyzed by gas chromatography mass spectrometry (GC-MS). The major component detected in each sample is dimethyl ether. See attached GC-MS chromatographs and data sheets</p>			
12. RESERVE SAMPLE: Unused sample was sealed in container box and kept in storage room for warehouse pick up			
13a ANALYST SIGNATURE 		13b DATE 7/21/99	
14a CHECK ANALYST SIGNATURE		14b DATE	
15a REPORT CHECKED BY 		15b DATE 7/20/99	

66

**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5290-04	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-06	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5290-11	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-12	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-04	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-06	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-09	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-10	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-04	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-07	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-11	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

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**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5293-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-04	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5293-05	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-08	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-01	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-03	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-06	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-09	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

Note: All units tested upright had flame extension greater than 18 inches, and flash back to the nozzle.

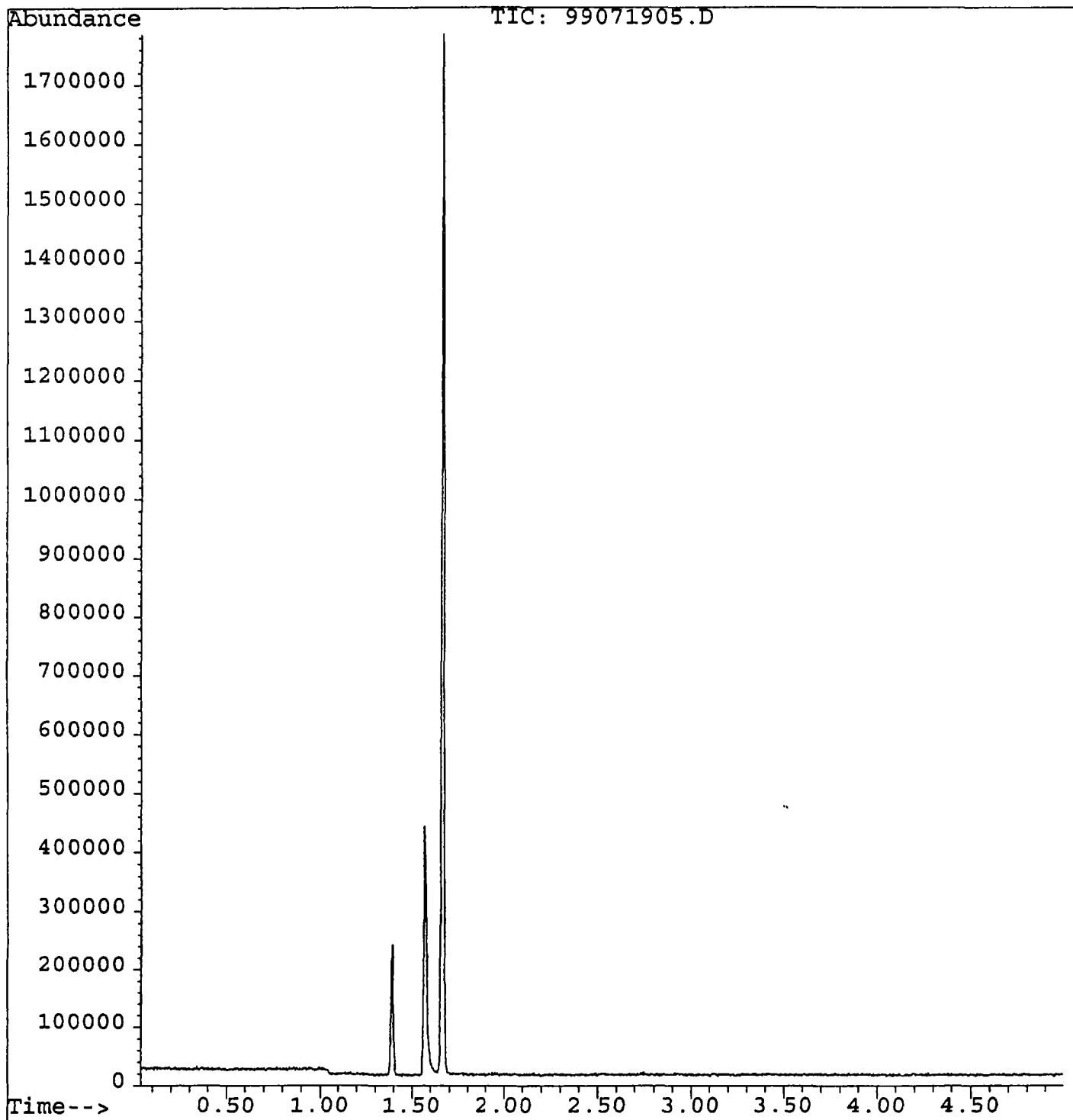
All units tested upside down extinguished the candle flame.

Units tested sideways yielded mixed results. Some units extinguished the candle flame immediately, other units had flame extensions greater than 18" and flash back for an extended time. Most units tested sideways had brief flame extensions, followed by extinguishment of candle flame.

66

99-860-5293
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7/20/99

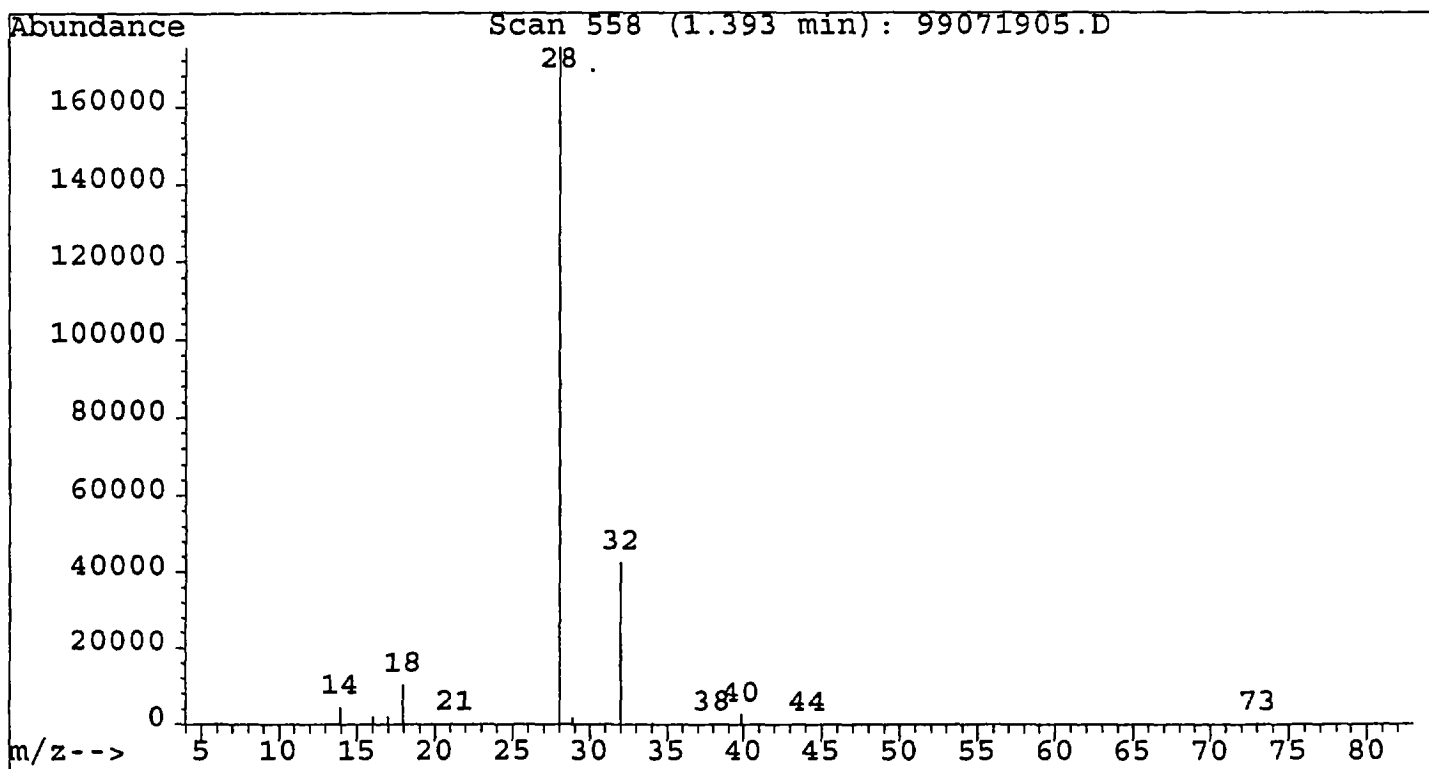
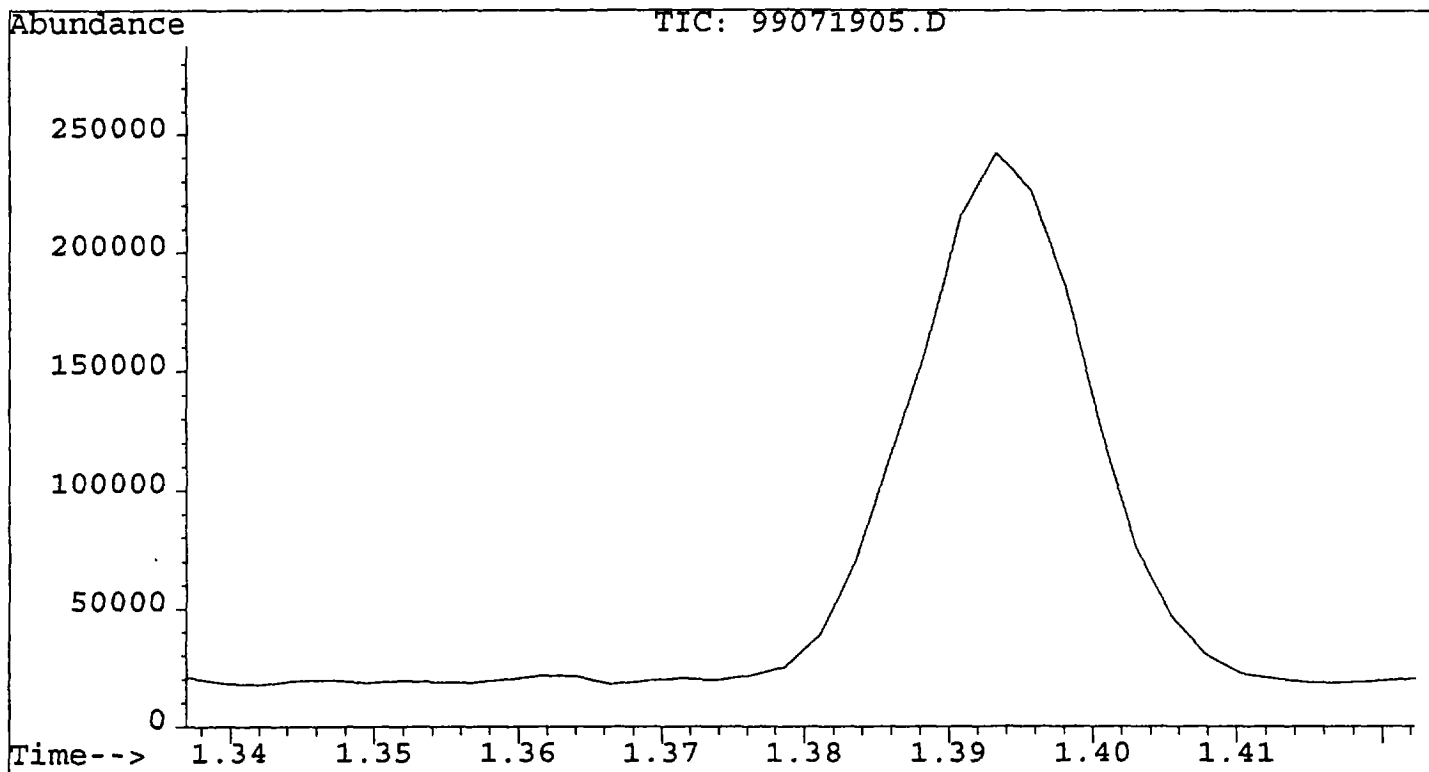
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Operator : Bhavi
Acquired : 19 Jul 99 9:38 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5293-01
Misc Info : 35 deg isothermal
Vial Number: 1



69

File : C:\HPCHEM\1\DATA\99071905.D
Operator : Bhavi
Acquired : 19 Jul 99 9:38 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5293-01
Misc Info : 35 deg isothermal
Vial Number: 1

77-060-2013
DL
7/20/99

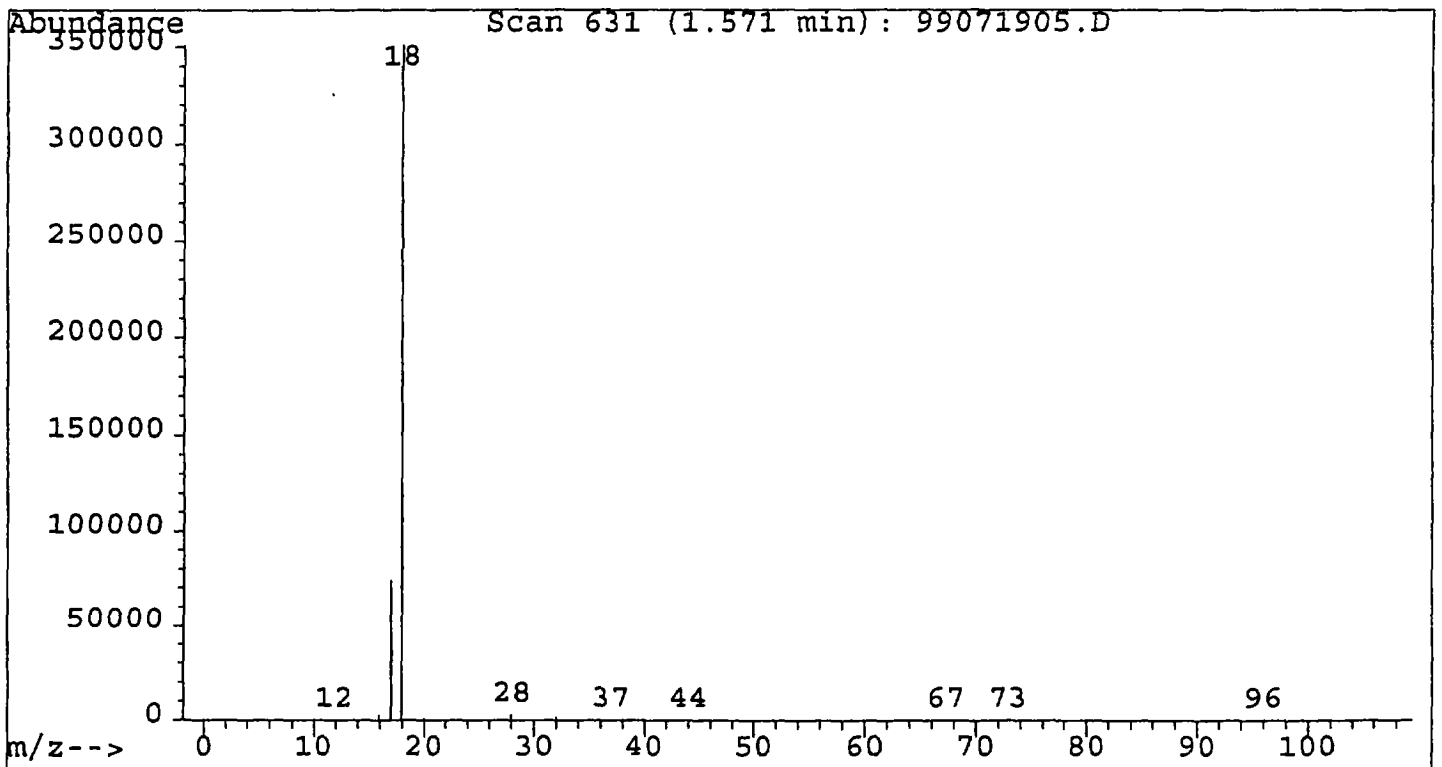
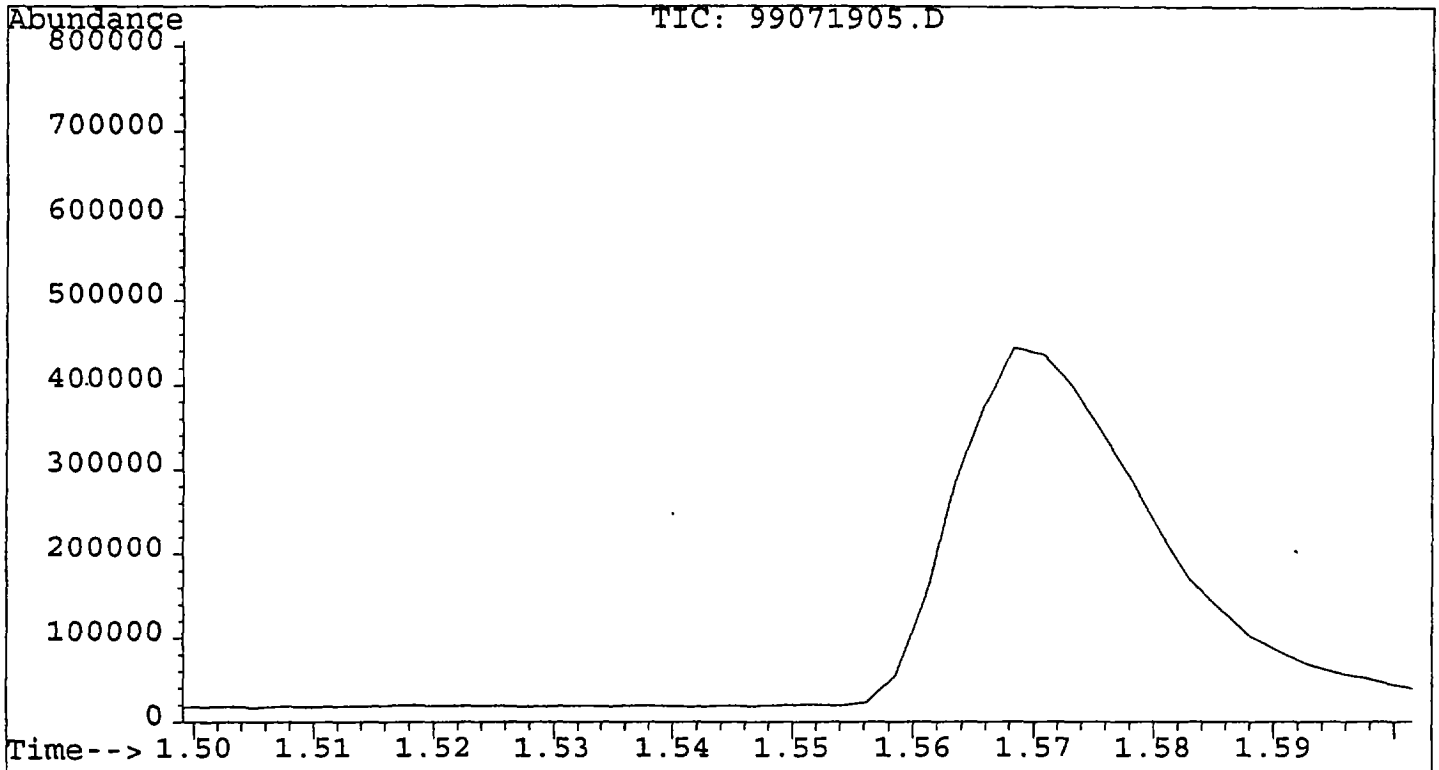


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Operator : Bhavi
Acquired : 19 Jul 99 9:38 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5293-01
Misc Info : 35 deg isothermal
Vial Number: 1

99-860-5293

DC

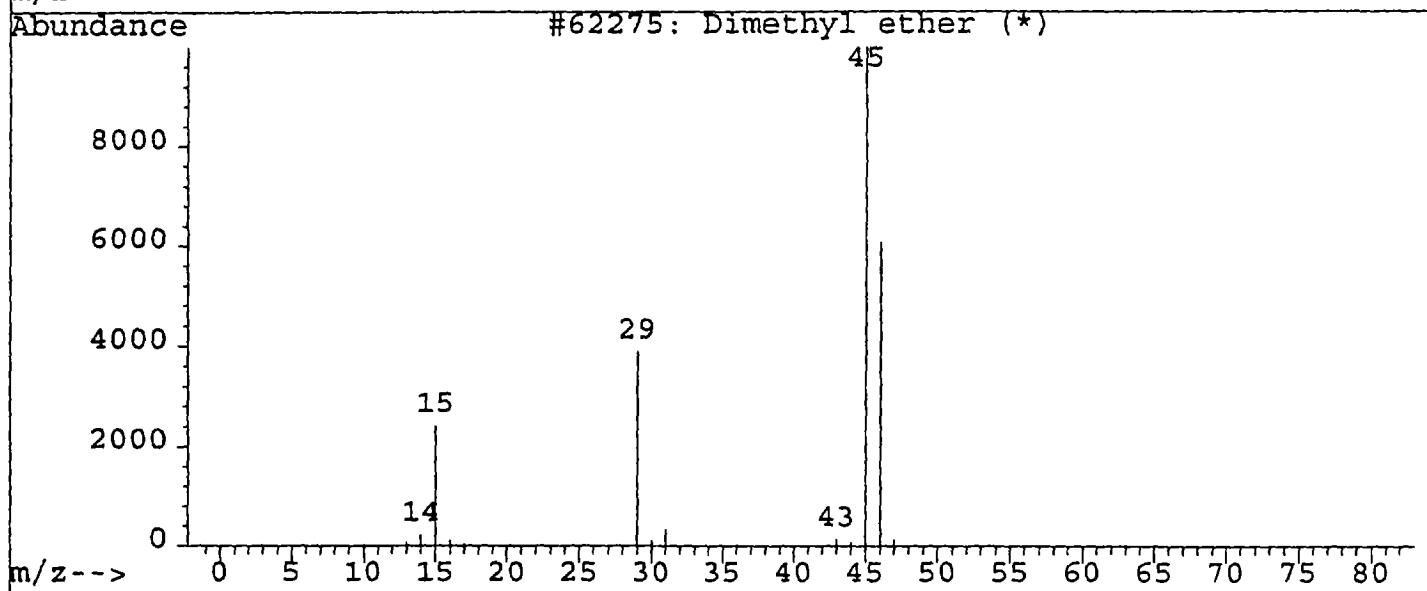
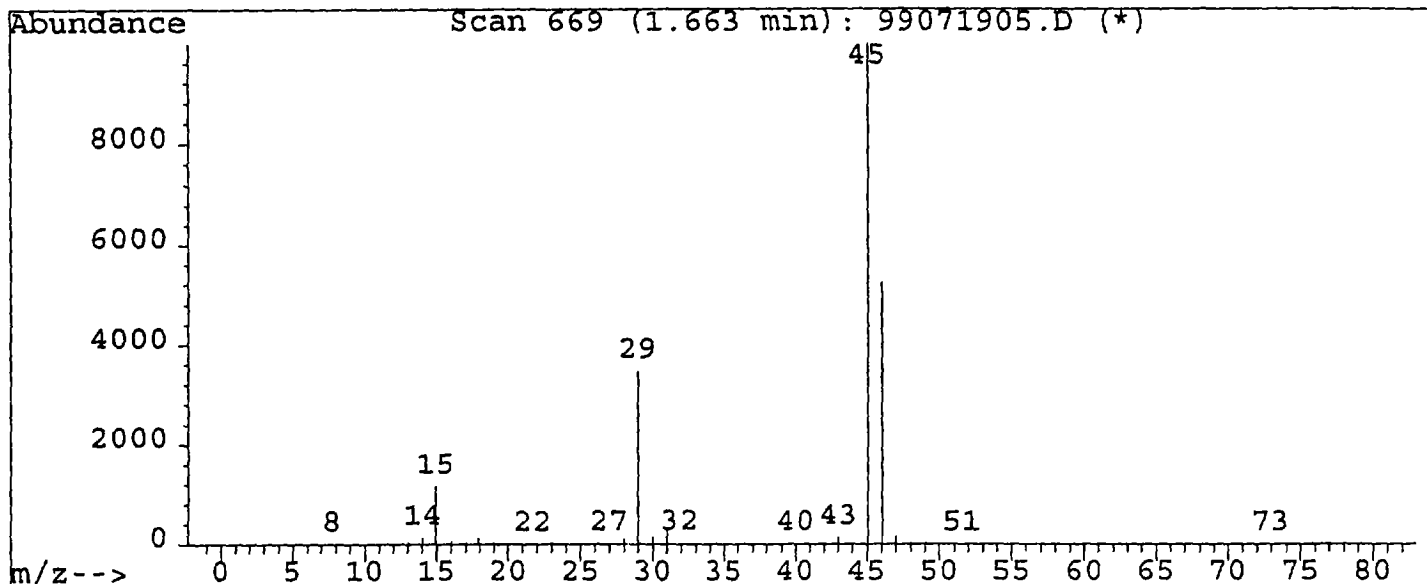
7/20/99



71

Library Searched : C:\DATABASE\NBS75K.L
Quality : 83
ID : Dimethyl ether


77-860-5293
D-
7/20/99



72

99-860-5013
DC
7/16/99

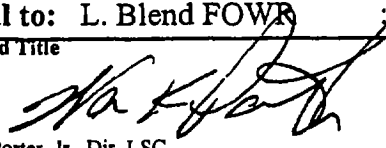
CONSUMER PRODUCT SAFETY COMMISSION



SAMPLE NO. 99-860-5293	DATE 7/14/99
SIGNATURE <i>[Signature]</i>	
PRINT NAME & TITLE (CPSC EMPLOYEES ONLY) DR. S. PERSON, PSC	
SEAL BROKEN BY DC	
DATE 7/14/99	

CPSC FORM 104

23

LABORATORY/COMPLIANCE SUMMARY		Sample Number: 99-860-5294
2. Laboratory Summary: Crazy Ribbon, Party Spray		
Flame Extension -- 16CFR1500.45 Flame Extension was greater than 18 inches Flash back occurred Composition: Major component was identified by GC/MS as Dimethyl Ether Dimethyl Ether is a gas at room temperature and in this formula acts a a propellant and possibly as a solvent. Dimethyl Ether has a reported Flash Point of -42 °F (-41 °C) [Langs Handbook of chemistry, 1956]		
Original to: L. Blend FOWR ; Copies to : LSC, CE - Krivda		
3. Name and Title		Date:
 Warren K. Porter, Jr., Dir. LSC		July 20, 1999
4. Firm Name: _____ ; Product: _____		
City, State: _____ ; Model#: _____		
5. Compliance Assessment:		
5. 11(c) Notice: Mfr/Imp.: _____ Retailer _____ Other _____		
Original Records to: _____ ; Copies: _____		
7. Name and Title:		8. Date:

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LABORATORY REPORT	1. PRODUCT: Crazy Ribbon, Party Spray	2. SAMPLE NUMBERS: 99-860-5294
3. SEALS: Intact	4. DATE REC: 7/15/99	5. LABORATORY: LSC
6. SAMPLE DESCRIPTION: 12 units were received in plastic bags. Sample had the following information: "99-860-5294, Lori S. Person, 7/14/99".		
7. LABELING: N/A	8. CUSTOMS ENTRY NO: N/A	9. LOT/MODEL#:
10. PRODUCT DESCRIPTION: Crazy Ribbon, the product spray different color strings of materials, and is used at children's birthday parties.		
11. ANALYTICAL RESULTS: <p>Flammability 16 CFR 1500.45: When tested upright, all units showed flame extensions greater than 18 inches and flash back to the nozzle. In the inverted position, none of the units tested showed flashback or flame extensions. In the sideways position, some units showed flashback and flame extension greater than 18 inches, while others did not. See attached table.</p> <p>GC-MS: The aerosol propellant from subunits from each sample were analyzed by gas chromatography mass spectrometry (GC-MS). The major component detected in each sample is dimethyl ether. See attached GC-MS chromatographs and data sheets</p>		
12. RESERVE SAMPLE: Unused sample was sealed in container box and kept in storage room for warehouse pick up		
13a ANALYST SIGNATURE <i>[Signature]</i>	13b DATE 7/20/99	
14a CHECK ANALYST SIGNATURE	14b DATE	
15a REPORT CHECKED BY <i>[Signature]</i>	15b DATE 7/20/99	

[Handwritten mark]

**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5290-04	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-06	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5290-11	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5290-12	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-04	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-06	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-09	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5291-10	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-04	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-07	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5292-11	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

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**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5293-01	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-04	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5293-05	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5293-08	U	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-01	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-03	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-06	S	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5294-09	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished

Note: All units tested upright had flame extension greater than 18 inches, and flash back to the nozzle.

All units tested upside down extinguished the candle flame.

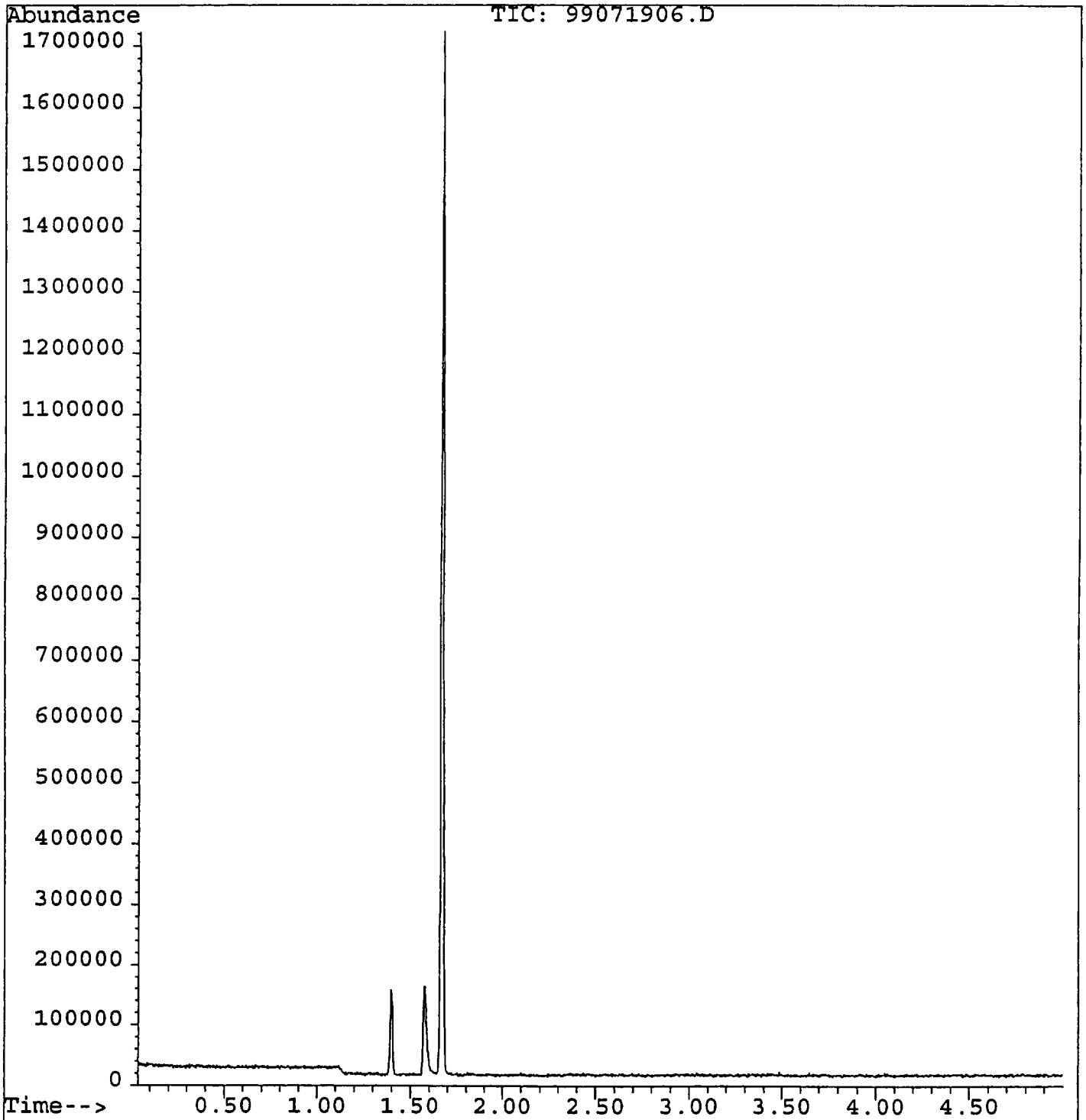
Units tested sideways yielded mixed results. Some units extinguished the candle flame immediately, other units had flame extensions greater than 18" and flash back for an extended time. Most units tested sideways had brief flame extensions, followed by extinguishment of candle flame.

99-860-5294

DC

7/20/99

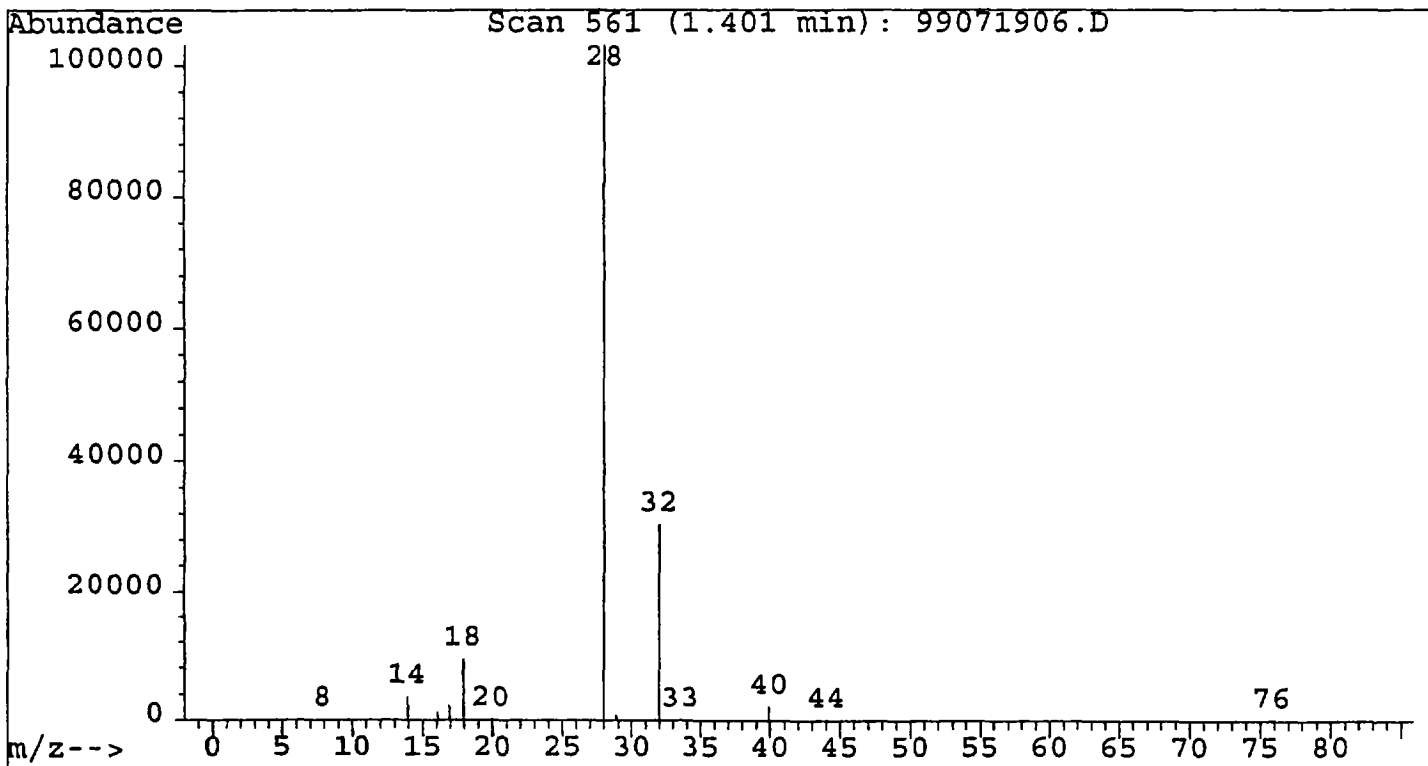
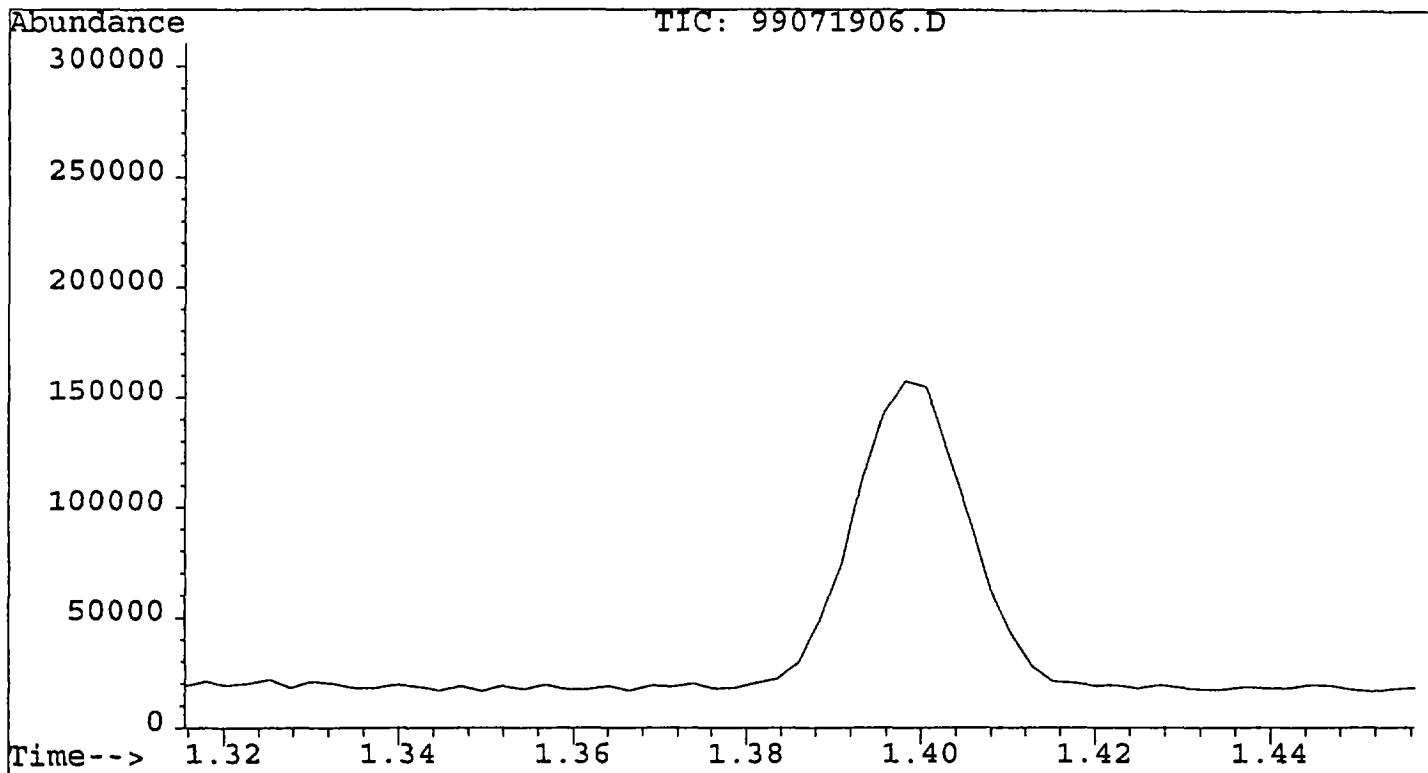
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Operator : Bhavi
Acquired : 19 Jul 99 10:07 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5294-01
Misc Info : 35 deg isothermal
Vial Number: 1



76

File : C:\HPCHEM\1\DATA\99071906.D
Operator : Bhavi
Acquired : 19 Jul 99 10:07 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5294-01
Misc Info : 35 deg isothermal
Vial Number: 1

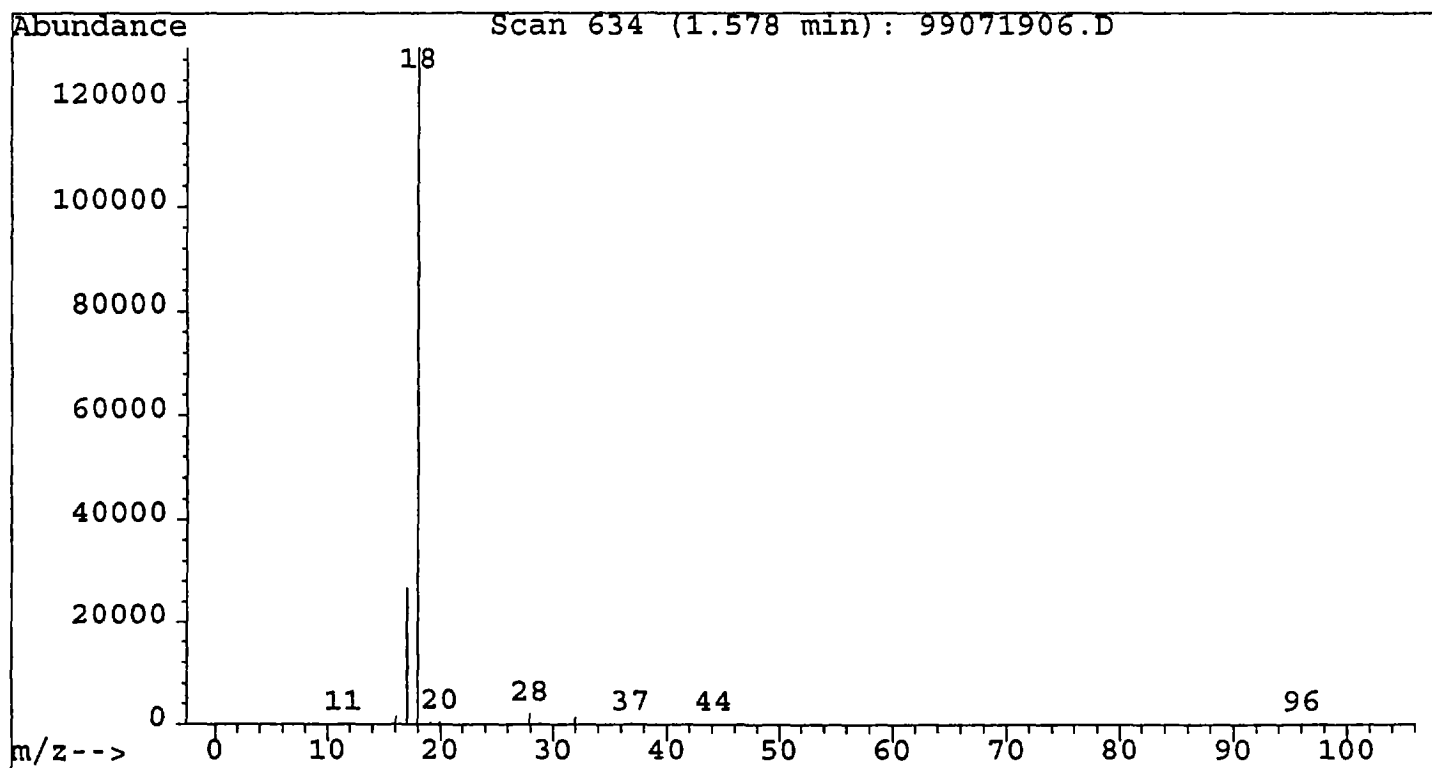
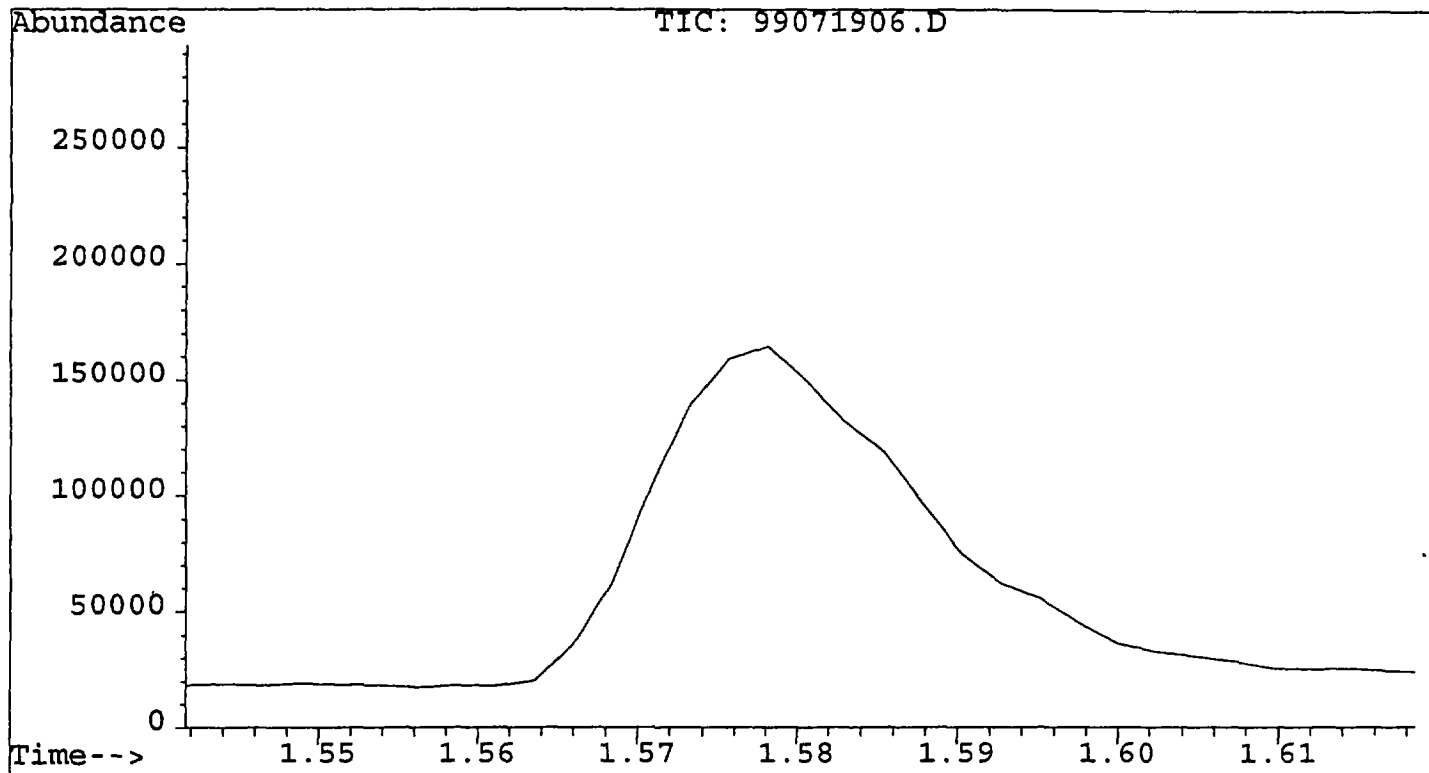
99-860-5294
DC
7/20/99



79

77-060-2017
DC
7/20/99

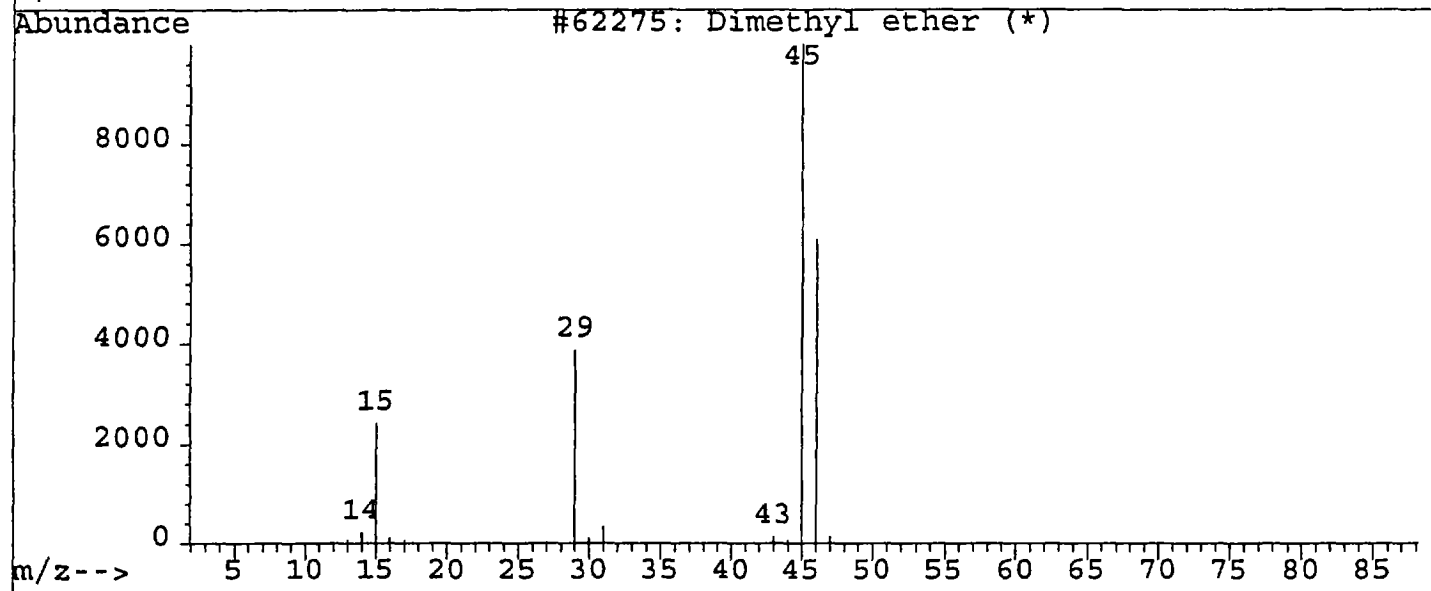
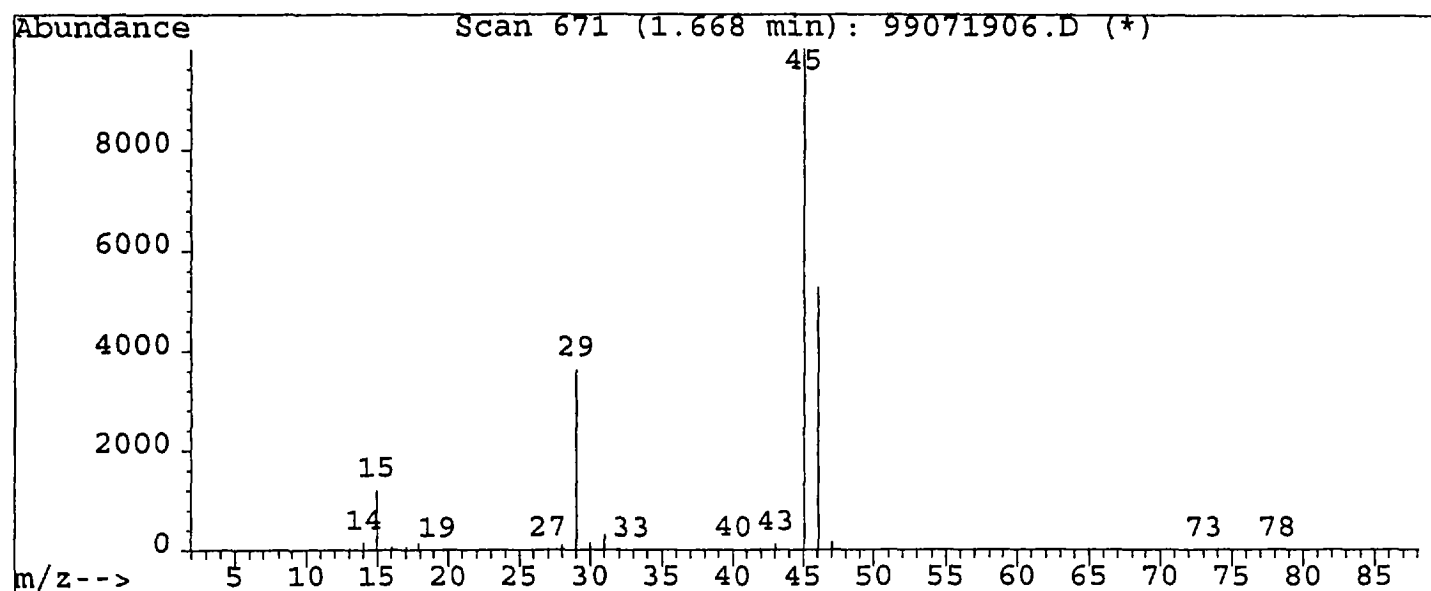
File : C:\HPCHEM\1\DATA\99071906.D
Operator : Bhavi
Acquired : 19 Jul 99 10:07 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5294-01
Misc Info : 35 deg isothermal
Vial Number: 1



80

77-064-517
7/20/99

Library Searched : C:\DATABASE\NBS75K.L
Quality : 91
ID : Dimethyl ether



81

99-860-5294
D
7/14/99

CONSUMER PRODUCT SAFETY COMMISSION



SAMPLE NO. 99-860-5294	DATE 7/14/99
SIGNATURE D. S. Pearson	
PRINT NAME & TITLE REPRESENTING D. S. Pearson, PSTI	
SEAL BROKEN BY D.	
DATE 7/14/99	

CPSC FORM 104

82

Author: Larry S. Blend at cpssc-hq1

Date: 7/21/99 2:59 PM

Normal

Receipt Requested

TO: Warren K. Porter at CPSC-LSEL, Ronald G. Yelenik at CPSC-HQ2

CC: Frank J. Krivda at CPSC-HQ2, Frank J. Nava at cpssc-hq1, Larry G. Cornell at cpssc-hq1,
Lori Starr Person at cpssc-hq1, Keven J. Barton at cpssc-hq1

TO: Cecil O. Smith at cpssc-hq1

CC: Norvan K. Allen at cpssc-hq1

Subject: Stelex sample.

----- Message Contents

Warren: Please give this sample your immediate attention. Results should go to me, Norvan, Krivda and Ron Yelenik.

Ron: If you have not yet spoken to the firm's attorney, you may wish to wait for these results. If violative, then we strengthen are position to request a recall of all "Crazy Ribbon" and "Crazy String" it imported. If violative we should also send the firm an LOA for the "Crazy String".

Cecil: Great job!!!

----- Forward Header -----

Subject: Stelex sample.

Author: "Cecil O. Smith" <cosmith@cpssc.gov> at INTERNET-MAIL

Date: 7/21/99 10:09 AM

Larry ----- for your information.

Ted Doi informed me that you were handling the compliance actions for his inspection of Stelex Enterprises, Los Angeles, CA - the importer of Crazy String. Yest day, I collected a sample of Crazy String (99-860-5277 - 14 units) from a retail store in the downtown toy district. This sample was traced back to Stelex with records. The Crazy String containers are marked "S.E", or Stelex Enterprises. The shipping records show Stelex sold the Crazy String on 4/19/99, 3 months ago. I will send the sample directly to the LSE lab, and will send Sub 14 to Norvan Allen.

Cecil.....

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Author: <wporter@cpsc.gov> at INTERNET-MAIL

Date: 7/22/99 9:10 AM

Normal

TO: <wporter@cpsc.gov> at internet-mail, <lblend@cpsc.gov> at internet-mail

CC: <fnava@cpsc.gov> at internet-mail, <lcornell@cpsc.gov> at internet-mail,
<kbarton@cpsc.gov> at internet-mail, <tdoi@cpsc.gov> at internet-mail,
<fkrivda@cpsc.gov> at internet-mail, <nallen@cpsc.gov> at internet-mail,
<ryelenik@cpsc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: Re: 99-860-5682: Crazy Ribbon

----- Message Contents

Larry,

99-860-5682 and 5295 are completed. The reports are being faxed to you. We videotaped 5682 under darker conditions, you can more readily see the burning streamer. The videotape and original reports will be sent Fed Ex to you. Both samples showed flash back and flame extensions in excess of 18". The propellant/solvent is di methyl ether.

Warren

Reply Separator

Subject: 99-860-5682: Crazy Ribbon

Author: <lblend@cpsc.gov> at INTERNET-MAIL

Date: 7/21/99 7:55 AM

Warren: I think you are already aware of this matter, but if not:

The above sample was collected by Ted Doi from a lot in import status on 7/16/99. The importer is Ameri-China Intl., Los Angeles, Ca. Two toy samples (99-860-5680/1) were also collected. The sample of Crazy ribbon was sent directly to LSC. Please give priority as there is no reason to believe that this lot is different than the other violative lots we have sampled. Although we have control of the sampled lot if violative, the firm may have received previous shipments that have been distributed.

The results should come to me, Norvan & Krivda.

Thanks!

Lawrence S. Blend

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July 21, 1999

Eddie Chen, Owner
Major Import, Inc.
2835 Pellissier Place
Whittier, California 90601

RE: CPSC samples 99-860-5290/1/2/3/4.
"Crazy Ribbon" Party String in various colors

Dear Mr. Chen:

The staff has completed its examination of the samples of "Crazy Ribbon" Party String. The item is a banned hazardous Substance under the Federal Hazardous Substances Act (FHSA) which we administer and distribution in this country is prohibited. The staff requests that you stop the distribution of current inventory and voluntarily recall to the consumer level distributed units.

On July 13, 1999 during an inspection of your establishment by Investigator Lori S. Person, five (5) samples of "Crazy Ribbon" Party String in pink, yellow, blue, orange and green colors were obtained from an inventory of 17,136 units. Documentation obtained shows that you imported the sampled lot.

The staff tested the product by the method described in 16 C.F.R. § 1500.45 and determined that the product is flammable as defined under 16 C.F.R. § 1500.3(c)(6)(viii) as the flame projection exceeded 18 inches when the valve was opened. Testing also determined that the product exhibited flash back. As a result, the product is a hazardous substance as described under 16 C.F.R. § 2(f)(1)(v) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. § 1261(f)(v), and, as it is a child's product, it is a banned hazardous substance under § 2(q)(1)(A) of the FHSA, 15 U.S.C. § 1261(q)(1)(A).

The sale, manufacture for sale, offer for sale in commerce, or importation of any banned hazardous substance is a prohibited act under Section 4 of the FHSA, 15 U.S.C. § 1263 and could subject your firm to the Penalties outlined in Section 5 of the FHSA, 15 U.S.C. § 1264. As a result, you could be subject to fines of up to \$1.5 million and imprisonment for not more than one year, or both. Please review Chapter 1 of the enclosed Regulated Products Handbook (Handbook) for additional details of these

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sanctions.

The Commission staff considers these test failures to be extremely serious and asks that you immediately stop the sale of current inventory, contact your direct consignees and implement a voluntary consumer level recall. This recall program is to include a recall notification letter to be issued to your direct consignees, point of purchase posters to be placed in each retail store where the product was offered for consumer sale and the issuance of a cooperative press release by the Commission. We also request that you produce a video news release in cooperation with the staff. The staff requests that you carefully review the rest of your product line for other children's products that contain the same chemical composition and therefore may be considered for similar corrective action. We also request that you not begin your voluntary recall until all the recall documents have been reviewed and accepted by the staff.

If you disagree with the Commission staff's findings that the product does not comply with the regulations, Chapter 2 of the enclosed Handbook describes the procedures for presenting your views and any supporting evidence to the staff.

If you plan to export the products, you must follow the procedures outlined in Chapter 6 of the Handbook. Failure to do so could subject you to the penalties described in Chapter 1 of the Handbook. The Commission may prevent the export of the products if it determines that their exportation presents an unreasonable risk of injury to U.S. consumers.

Sections 15 and 37 of the CPSA contain requirements for reporting to the Commission information on certain products you manufacture, import or distribute. Chapter 5 of the Handbook describes the reporting requirements applicable to your firm. Chapter 7 of the Handbook contains information about the confidential treatment of information you submit to the Commission.

Please respond by facsimile or by telephone within **24 hours** from the date you receive this letter, outlining the specific corrective actions you plan to take to address the hazard associated with this product. Please direct your response to:

Lawrence S. Blend, Compliance Officer
U. S. Consumer Product Safety Commission
1708 Arvada Drive
Richardson, Texas 75081-2132

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Mr. Blend may be reached by phone at 972-231-5023 (voice) and 972-231-5317 (fax). His e-mail address is: lblend@cpsc.gov

Thank you for your cooperation in this matter.

Sincerely,

Frank J. Nava
Director

Enclosure: Regulated Products Handbook
Test Reports
FHSA and its Regulations

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FOR OFFICIAL USE ONLY

Bcc: Frank Krivda
Frank Nava
Larry Cornell
Keven Barton
Norvan Allen
Lori Person
Establishment file
Larry Blend

Bcc footnote: Last of the lab results received 2PM central time 7/21/99. Norvan is on Annual Leave until 7/26/99.



Author: Ted Doi at cpsc-hq1

Date: 7/20/99 8:30 AM

Normal

CC: Frank J. Krivda at CPSC-HQ2, Ronald G. Yelenik at CPSC-HQ2,

Keven J. Barton at cpsc-hq1, Frank J. Nava at cpsc-hq1, Larry G. Cornell at cpsc-hq1

TO: Larry S. Blend at cpsc-hq1

Subject: Re: Stelex's Silly ribbon

----- Message Contents

Larry B.,

On 6-7-99 I sent Stelex a fax message requesting the importation records, distribution records, and other information on the Crazy String. Stelex had denied having ever imported the Crazy Ribbon and claimed that it had imported only the Crazy String. Then I did not know that Stelex imported the Crazy Ribbon in 1996.

On 7-7-99 when I learned Stelex's importation of the Crazy Ribbon, I sent the firm a fax message requesting the importation records and distribution records on both Crazy Ribbon and Crazy String.

The only records I've been able to receive from Stelex so far are the ones that cover the "only" lot of the Crazy Ribbon imported by the firm in 1996. The invoice issued to Stelex by New International Corp., Taipei, Taiwan, covers 4,560 units of the product. Stelex provided a copy of seven sales receipts covering only 2,160 units.

I insisted Stelex should provide all importation and distribution records on the Crazy String. Mr. Cheng said the firm would provide them but would need more time to search for the records. When I spoke to his attorney Albert Chang by phone about the records, he repeated what Mr. Cheng had told me.

Mr. Cheng does not know if the Crazy Ribbon and the Crazy string use the same chemical formula.

Mr. Cheng insisted that Top Grease Industrial Co., Ltd., the manufacturer of both Crazy Ribbon and Crazy String had shipped mixed lots of both products to Stelex and other US importers. He said that Top Grease had agreed to use the brand name, Crazy String, exclusively for Stelex. He added that Stelex had been gathering information to confirm that Top Grease had been selling the Crazy String to other importers. He said that Stelex would sue Top Grease for a breach of agreement.

Mr. Cheng claimed that Stelex had never sold any Crazy Ribbon to One Stop Party Shop, Fontana, CA, where Sample 99-860-5373 of the Crazy Ribbon was collected on 6-3-99. He insisted that Stelex sold the Crazy String, not the Crazy Ribbon and that the retailer did not purchase the sampled Crazy Ribbon from Stelex.

Mr. Cheng claimed that the LoA on Sample 99-860-5373 did not instruct Stelex to recall the Crazy Ribbon it had imported and distributed. He said that if CPSC requested Stelex to recall the product, Stelex would. (Larry, sorry. I forgot to tell you this during our telephone conversation of this morning. I believe if we "order" him to voluntarily recall the product according to our guidance, he will do so.)

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Stelex is represented by Albert J.C. Chang, Law Offices of Albert J.C. Chang, 19138 Walnut Dr., Suite 100, Rowland Heights, CA 91748, Tel: 626-854-2112, Fax: 626-854-2120.

Reply Separator

Subject: Stelex's Silly ribbon

Author: Larry S. Blend at cpsc-hq1

Date: 7/19/1999 9:31 AM

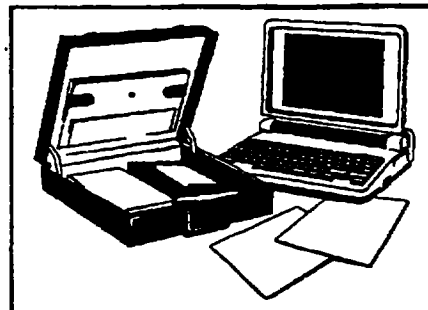
Ted: Did you get the records last week that the firm promised. If not please contact Mr. Cheng and find out why not? Also, the firm to my knowledge has yet to address the issue of recall. Is he? Is he going to recall the 1996 shipment of 150 cases received, too. If not, why not?

Depending on the firm's answers today, I may turn this matter over to Yelenick for legal action consideration.

Thanks Ted. Call me if you have questions.

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
1708 Arvada Drive
RICHARDSON, TEXAS 75081-2132



Telephone: (972) 231-5023
Fax: (972) 231-5317
E-mail: lblend@cpsc.gov

RUSH

From: Lawrence S. Blend (Compliance Officer)

Date: 7/20/99

Subject: Stelix Enterprise, Inc.

Comments: Records supplied by the firm to Ted Doi. He firm has accounted for the distribution of a 1/2 of the units it imported in 1996

NOTE: IF YOU HAVE ANY PROBLEMS WITH THIS TRANSMITTAL, PLEASE CONTACT THE PERSON LISTED ABOVE.

NUMBER OF PAGES TRANSMITTED: 11 + COVER

TO: Frank Kruda / Ron Yplenech

TITLE: _____

OFFICE: Compliance

FAX NUMBER: _____

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RUSH

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