
Author: Norvan K. Allen at CPSC-HQ1

Date: 7/27/99 6:58 AM

Normal

TO: Frank J. Krivda at CPSC-HQ2

Subject: Crazy String Status

----- Message Contents

FYI

Forward Header

Subject: Crazy String Status

Author: Warren K. Porter at CPSC-LSEL

Date: 07/27/1999 8:13 AM

LSC has received the following samples:

Samp #	Status
99-860-5277	Frank Krivda has this one
5279	Not received
5680	At Warehouse - Should be delivered today
5681	At Hdqrts Compliance
5682	Reported out
5290 through 5295	Reported out
5374	Reported out
5375	Reported out

So far all the units tested have flame extensions in excess of 18" and flash back in one or more of the positions and shaken or unshaken modes. All contain Dimethyl ether as the solvent/propellant.

I put a call into the sample custodian to ensure that 99-860-5860 and 5279 asre delivered promptly.

Are I missing any samples in the above list?

Larry,

Have you received the empty cans and 2 video tapes? All the cans are the same, they just have different color tops.

Warren

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FOR OFFICIAL USE ONLY

99-860-5277
7-30-99

Distr:
Orig: Stelex Enterprise Inc.

Cc: CHP – Frank Krivda
CLD - Ron Yelenik
FOWR-SFO – Estab. file

e-mail

cc: CHP – Frank Krivda
CLD – Ron Yelenik
FOWR-SFO – Larry Cornell

Summary: Frank Nava, Larry Blend, Ted Doi, Keven Barton

Summary: This letter reports the failure of Crazy String to Stelex and repeats CPSC request to recall Crazy Ribbon to the consumer level as well as Crazy String. The sample was collected in domestic status from a retailer who received the product from a distributor, on 4-19-99, who received it from Stelex, on 4-19-99. This sample failed as badly as all other current samples of

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**U. S. CONSUMER PRODUCT SAFETY COMMISSION
WESTERN REGIONAL OFFICE**

600 HARRISON STREET, ROOM 245, SAN FRANCISCO, CA 94107-1370
(415) 744-2966 FAX (415) 744-2962 www.cpsc.gov

July 30, 1999

Albert J.C.Chang, Esq.
19138 Walnut Dr., Suite 100
Rowland Heights, CA 91748

Via facsimile and FED EX

RE: CPSC Sample 99-860-5375
Crazy Ribbon, 120 g
CPSC Sample 99-860-5277
Crazy String, 120 g

Dear Mr. Chang :

On July 9, 1999, I wrote to your client, Stelex Enterprises, Inc., ("Stelex: or "the firm") reporting on the Commission's finding that CPSC sample 99-860-5375 of an aerosol product, Crazy Ribbon, distributed by the firm was a banned hazardous substance as defined under § 2(f)(1)(A)(v) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. § 1261(f)(1)(A)(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), (see copy attached).

The Commission has now obtained a sample (99-860-5277) of another aerosol product, Crazy String, also distributed by your firm. Grace Qian, owner of 22 Century Toy Co., formerly Toy Palace Trading Co., 204 Boyd St., Los Angeles, CA 90013, signed an affidavit and provided a copy of invoice 103547, dated 4-20-99, issued by Ameri-China International, 917 S. Alameda St., Los Angeles, CA 90021, showing sale of 10 cartons of 12 dozen Crazy String to Toy Palace. The Commission has a copy of Stelex invoice 972535, dated 4-19-99, showing the sale of 10 cartons of Item No. N-SE6002 Crazy String, (five colors), to Ameri-China International.

The staff tested the sample of Crazy String 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 § 2(f)(1)(A)(v) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. § 1261(f)(1)(A)(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 product is a prohibited act under Section 4 of the FHSA. 15 U.S.C. § 1263 and could subject your client to the penalties outlined in Section 5 of the FHSA. 15 U.S.C. § 1264. As a result, the firm 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 sanctions.

A handwritten signature or initials, possibly "SS", written in black ink.

In addition to the test failure of Crazy Ribbon reported to Stelex in my letter of July 9, 1999, the Commission staff considers the test failure of Crazy String to be extremely serious and asks that the firm immediately stop sale of both Crazy Ribbon and Crazy String and implement a voluntary consumer level recall. This recall program should include a recall notification letter to be issued to Stelex customers who received Crazy Ribbon and/or Crazy String., point of purchase recall posters where the product was offered for consumer sale, posting of the recall on the firm's internet website, if such exists, and the issuance of a press release in conjunction with the Commission. We also request that Stelex produce a video news release in cooperation with the staff.

The staff also requests that Stelex carefully review the rest of its product line for other children's products that contain the same chemical composition and therefore may be considered for similar corrective action.

On or before August 6, 1999, please provide a written plan outlining the specific corrective actions Stelex plans to take to address the hazard associated with these products. Also by that date, provide all requested information and documents regarding Crazy Ribbon and Crazy String, including but not limited to, information and documents requested by Commission investigator Tetsuo Doi. The staff has reason to believe that the information provided by Stelex, to date, regarding distribution in commerce of the products is incomplete. If Stelex fails to comply in a timely manner with these requests, the staff will be forced to pursue compulsory measures, including, but not limited to, seizure of the products and the use of a subpoena to obtain outstanding information and documents. Moreover, the staff will consider the issuance of a unilateral press release in this matter.

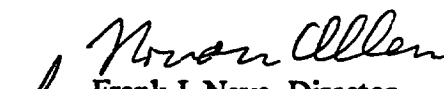
For your information, the staff has inspected the firms identified by Stelex as other importers of Crazy Ribbon, as well as others, and collected samples from several. A number of these firms are currently cooperating with the Commission by instituting voluntary recalls to the consumer level and pledging to issue joint press releases covering Crazy Ribbon or Crazy String imported and distributed by their firms. The staff looks forward to the cooperation of Stelex in this regard.

Please direct your response to:

Norvan Allen, Compliance Officer
U.S. Consumer Product Safety Commission
1412 Vassar Dr. SE
Albuquerque, NM 87106
(505) 260-1707, fax (505) 260-1710, internet nallen@cpsc.gov

Thank you for your cooperation in this matter.

Sincerely,


Frank J. Nava, Director
Western Region

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Enclosures: Test Report
Regulated Products Handbook
Nava 7-9-1999 Letter

Cc: Ronald G. Yelenik, Esq.
Litigation Division
Office of Compliance

57

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CPSC Sample 99-860-5277
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Frank J. Nava, Director
Western Region

Enclosures: Test Report
Regulated Products Handbook
Nava 7-9-1999 Letter

Cc: Ronald G. Yelenik, Esq.
Litigation Division
Office of Compliance

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FOR OFFICIAL USE ONLY

99-860-5277

7-30-99

Distr:

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Cc: CHP – Frank Krivda

CLD - Ron Yelenik

FOWR-SFO – Estab. file

e-mail

cc: CHP – Frank Krivda

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Summary: Frank Nava, Larry Blend, Ted Doi, Keven Barton

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b1

Author: "Norvan K. Allen" <nallen@cpsc.gov> at INTERNET-MAIL

Date: 8/5/99 11:20 AM

Normal

TO: <ryelenik@cpsc.gov> at internet-mail, <estone@cpsc.gov> at internet-mail

CC: "Blend" <lblend@cpsc.gov> at internet-mail,

"Cornell" <lcornell@cpsc.gov> at internet-mail,

"Keven" <kbarton@cpsc.gov> at internet-mail,

"Krivda" <fkrivda@cpsc.gov> at internet-mail, "Nava" <fnava@cpsc.gov> at internet-mail,

"Ted" <tdoi@cpsc.gov> at internet-mail, <troger@cpsc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: Stelex Response to 7-30-99 LoA

----- Message Contents

I received a fax response to the LoA sent to Stelex attorney last Friday. The response agrees to everything we asked for. I have fax'd a copy to Ron. I will be working with the attorney on the recall.

The letter states that Stelex will provide all the documents Ted originally requested within two weeks. What Ted received so far includes desk invoices with no names or no addresses. I will be asking for names, addresses and amounts. While the response speaks of both Crazy products, the proposed recall letter only speaks of Crazy STRING, not Crazy RIBBON.

The firm also asked about sharing expenses on the production of a Video News Release.

Norvan

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Author: Norvan K. Allen at CPSC-HQ1

Date: 8/11/99 9:20 AM

Normal

TO: Mark K. Ross at CPSC-HQ1

CC: Larry S. Blend at CPSC-HQ1, Frank J. Nava at CPSC-HQ1, Larry G. Cornell at CPSC-HQ1,
Keven J. Barton at CPSC-HQ1, Frank J. Krivda at CPSC-HQ2

Subject: Re[3]: status of Crazy Ribbon et. al.

----- Message Contents

Mark,

See my comments below. I believe you already have Larry's

Reply Separator

Subject: Re[2]: status of Crazy Ribbon et. al.

Author: Mark K. Ross at CPSC-HQ1

Date: 08/10/1999 3:01 PM

I think we should do one press release announcing all the companies recalling all the crazy strings and ribbons.

I agree. Will the fact that Stelex will be the only firm recalling Crazy String cause any problems with a single release?

The information sent on the drafts submitted... for Stelex and Major Import, is very limited. It doesn't have number of products from each company, price, contact info, where sold, etc.

The draft press release for Stelex was sent to you so you could begin to work on it and the possible single press release. The basic information is the same for Major, Le Sa Yang Family and Stelex.

Stelex is slowly providing the missing information. I will forward this to you as I receive it. In the interim, your draft single press release will be very useful in dealing with Stelex.

I can't find a draft on the Le Sa Yang Family, Ltd. Can I get this sent again?

Larry's firm

Is it possible to get samples for each company's product and the above information?

All samples have been analysed for the 3 firms above. However, if you are asking about exhibits for Public Affairs activities, You may obtain these from the reserve samples being held by the Sample Custodian, as pointed out to you by Larry.

When will all the companies doing this type of recall be ready to go? Will there be 5 all together?

Again, I am still waiting for the distribution, toll-free number, etc. from Stelex. The firm has advised Ted Doi some of this is ready and they will be sending it to them.

Will they be willing to do a Video News Release?

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Larry has covered this in his response. Stelex is agreeable both for a VNR and sharing the cost. They have asked about this procedure. I have the material you sent to Larry on this subject.

Mark

Reply Separator

Subject: Re: status

Author: Larry S. Blend at cpsc-hq1

Date: 8/10/99 11:23 AM

Mark: What is the status of my draft press releases on Major Import and Le Sa Yang Family, Ltd.? Are you going to combine them? Major Import began its recall on 8/3/99 and Le Sa Lang Family, Ltd has already called its consignees to stop sale and should issue a recall letter any day now. How about Norvan's draft involving Stelex Enterprises he recently sent you? All involve essentially the same product. There is the possibility that two more importers may be identified but their recalls if any are several weeks away.

Thanks!

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

Date: 8/24/99 7:37 AM

Normal

TO: <mross@cpsc.gov> at internet-mail, <cefieldcoord@cpsc.gov> at internet-mail,
<estone@cpsc.gov> at internet-mail, <fkrivda@cpsc.gov> at internet-mail

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

BCC: Frank J. Krivda at CPSC-HQ2

Subject: spray string matter

----- Message Contents

Below is my report for the two firms I am handling. Norvan Allen will report on Stelex. Each of my two firm was supplied a copy of the draft press release without the names and addresses of any firms shown.

Major Import, Inc.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is willing to contribute \$4,000 to a VNR.

Le SaYang Family, Ltd.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is NOT willing to contribute any amount of money to the VNR.

I await further instructions.

Lawrence S. Blend

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Author: Norvan K. Allen at CPSC-HQ1
Date: 8/25/99 1:13 PM
Normal
CC: <lblend@cpsc.gov> at INTERNET-MAIL
TO: Mark K. Ross at CPSC-HQ1
CC: Ken P. Giles at CPSC-HQ1, Frank J. Krivda at CPSC-HQ2, Patrick D. Weddle at CPSC-HQ1,
Theresa D. Rogers at CPSC-HQ2, Kathleen P. Begala at CPSC-HQ1
TO: Marc J. Schoem at CPSC-HQ2, David A. Walden at CPSC-LSEL, Jacqueline Elder at cpsc-hq1,
Warren K. Porter at CPSC-LSEL
Subject: Re[3]: spray string matter

----- Message Contents

After viewing the video clip of one test Warren sent us, I can wholeheartedly endorse his comment on the esthetic appeal of the G burn room

Norvan

Reply Separator

Subject: Re[2]: spray string matter
Author: Warren K. Porter at CPSC-LSEL
Date: 08/25/1999 2:25 PM

Mark,

There are a number of samples of the crazy ribbon/string or whatever that were extremely flammable, 99-860- 5290 through 5294 and 99-860-6484. These are in the warehouse.

There are a number of samples that extinguished the flame or showed no flame extension/flashback. Those are 99-XXX-5711, 5734, 5764, 5772. Those too are in the warehouse.

What is your schedule for the VPR and where will it be filmed. We can test them in the laboratory hoods if that is that you want. That is somewhat restrictive. We can also use the burn room in building G or perhaps the burn room in building A. The G burn room is large and would allow for ease in setting up cameras and props (table and BDay cake if so desired. The burn room in A is somewhat more confined but useable. You should bear in mind that the burn room in Building G is REALLY NOT PRETTY. It would require setting up some panels to make it presentable.

I would suggest that the filming people come out for a look at the space available. This should be done with adequate advance time to set up painted panels to accomodate the asthetics of the scene, prior to the actual filming.

If you are considering doing the VNR at EWT, the major flame extension is about 4 to 6 feet and the string continues on to up to 10 feet. The string is still flaming when it hits the wall, floor, etc. Some review of the smoke detectors currently operating in EWT and safety considerations would be necessary prior to filming.

Warren

66

Reply Separator

Subject: Re: spray string matter
Author: Marc J. Schoem at CPSC-HQ2
Date: 08/25/1999 12:37 PM

OIPA will pay for the VNR - can you send me the final release that was sent to the firms. Ken Giles is coordinating the VNR. Warren Porter at the Lab may have some additional samples that can be used for the VNR. I've asked Larry Blend and Norvan Allen to see if additional samples can be obtained for use in shooting the video and for publicizing the recall.

Reply Separator

Subject: spray string matter
Author: <lblend@cpsc.gov> at INTERNET-MAIL
Date: 08/24/1999 7:37 AM

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Le SaYang Family, Ltd.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is NOT willing to contribute any amount of money to the VNR.

I await further instructions.

Lawrence S. Blend

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Author: Marc J. Schoem at CPSC-HQ2
Date: 8/25/99 3:26 PM
Normal
TO: Warren K. Porter at CPSC-LSEL
CC: Frank J. Krivda, Theresa D. Rogers, Ken P. Giles at CPSC-HQ1
Subject: Re[3]: spray string matter

----- Message Contents

Thanks Warren! I'll defer to OIPA for the filming location. Larry Blend has requested additional samples from his company and they indicated 24 cans are being sent to us.

Reply Separator

Subject: Re[2]: spray string matter
Author: Warren K. Porter at CPSC-LSEL
Date: 08/25/1999 2:25 PM

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Subject: Re: spray string matter

----- Message Contents

OIPA will pay for the VNR - can you send me the final release that was sent to the firms. Ken Giles is coordinating the VNR. Warren Porter at the Lab may have some additional samples that can be used for the VNR. I've asked Larry Blend and Norvan Allen to see if additional samples can be obtained for use in shooting the video and for publicizing the recall.

Reply Separator

Subject: spray string matter

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

Date: 08/24/1999 7:37 AM

Below is my report for the two firms I am handling. Norvan Allen will report on Stelex. Each of my two firm was supplied a copy of the draft press release without the names and addresses of any firms shown.

Major Import, Inc.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is willing to contribute \$4,000 to a VNR.

Le SaYang Family, Ltd.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is NOT willing to contribute any amount of money to the VNR.

I await further instructions.

Lawrence S. Blend

72

Author: "Norvan K. Allen" <nallen@cpsc.gov> at INTERNET-MAIL

Date: 8/24/99 10:21 AM

Normal

TO: <mross@cpsc.gov> at internet-mail,
"CE coordinator" <Cefieldcoord@cpsc.gov> at internet-mail,
"Eric" <estone@cpsc.gov> at internet-mail,
"Krivda" <fkrivda@cpsc.gov> at internet-mail
CC: "Frank Nava" <fnava@cpsc.gov> at internet-mail,
"Blend" <lblend@cpsc.gov> at internet-mail,
"Cornell" <lcornell@cpsc.gov> at internet-mail
BCC: Frank J. Krivda at CPSC-HQ2
Subject: Spray String Matter

----- Message Contents

I received a letter from the firm's attorney stating that Stelex has no objection to releasing their name to the other two firms PROVIDED their names are given to Stelex. I responded with a letter giving Stelex the names of Major Import and LeSa Yang Family.

The attorney also reported the recall letters for both Crazy RIBBON and Crazy ST RING were sent out on August 19th. I had approved both letters. Stelex has not yet sent me their proposed recall posters for approval. I pointed this out in my letter to the attorney.

Stelex has asked what financial arrangement the other two firms have offered, before committing to a Video News Release. In my letter I said one firm agreed to contributing \$ 4,000 while the other had declined to participate. I did not identify the firms.

I included the latest draft press release, without the staff comments or questions, with the letter and requested Stelex comments.

Norvan

73

Author: Marc J. Schoem at CPSC-HQ2
Date: 8/25/99 3:37 PM
Normal
TO: Frank J. Krivda, Theresa D. Rogers
Subject: Crazy String Status

----- Message Contents

FYI

Forward Header

Subject: Crazy String Status
Author: Norvan K. Allen at CPSC-HQ1
Date: 08/25/1999 1:21 PM

I just spoke with Albert Chang, attorney for Stelex. He checked with his client on their inventory of the party spray product. Stelex has no inventory of either Crazy Ribbon or Crazy String.

Some customers have already contacted Stelex about returning product, but it is not known when these shipments will be received.

I advised Mr. Chang that the Commission will be funding and producing the VNR. He said his client was agreeable to contributing \$ 4,000 before the CPSC decision was made. I also explained the VNR, as the written press release will be accurate and factual. He and his client will be given a chance to see the VNR before it is released.

Mr. Chang said neither he nor Stelex have any significant comments on the draft press release sent to him. He will respond in writing shortly.

Norvan

74

Author: Murray S. Cohn at CPSC-HQ1
Date: 5/19/99 3:57 PM
Normal

TC-47

TO: Catherine E. Downs at CPSC-HQ2, George W. Rutherford at CPSC-HQ2, Incident Reports
Subject: Internet Form Complaint - Doc # I9950104
----- Message Contents

5/19/99 11:03:02 AM

Name = Ted Baum Esq.
Address = P.O. Box 4543
City = Palm Springs
State = CA
Zip = 92263-4543
Email = tedbaum@earthlink.net
Telephone = 760-325-2681
Name of Victim = JAMES ANDREW GARCIA, a minor
Victim's Address = 19390 Rose Lane
Victim's City = Bloomington
Victim's State = CA
Victim's Zip = 92316
Victim's Telephone = 760-325-2681

ISSUE 34

MAY 21 1999

Incident Description: My clients, JAMES and LISA GARCIA purchased some cans of a product called CRAZY RIBBON, from ONE STOP PARTY, 16761 Valley Blvd., Unit A, Fontana, CA (Telephone 909-356-5611) The named manufacturer on the can is TOP GREASE CO. LTD., but there is no address or contact information. On May 15, 1999, my clients had a birthday party for their son, JAMES ANDREW GARCIA, born 5/14/88. After the candles were blown out on his birthday cake, the children at the party sprayed the CRAZY RIBBON. It started a fireball, and the child's head caught on fire. He suffered major burns on his face, ears, nose, head, and arms. The boy's father, JAMES, also suffered burning of is facial hair. There were about twenty people present, with many little children. THIS PRODUCT IS EXTREMELY DANGEROUS AND NEEDS TO BE PULLED OFF THE MARKET NOW.

Victim's age at time of incident = 11
Victim's sex = Male
Date of incident = May 15, 1999
Product involved = Can that sprays ribbon
Product brand name/manufacturer = CRAZY RIBBON/ TOP GREASE CO. LTD.
Product involved still available = Yes
Product model and serial number =
Date product purchased = May, 1999

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Le Sa Yang Family, Ltd.
Page

July 22, 1999

May Yu, President
Le Sa Yang Family, Ltd.
2558 Blaze Trail
Diamond Bar, California 91765

CPSA 6 (b)(1) Cleared

No. Mfrs/PrvtLblrs or

Products Identified

Excepted by

Firms Notified,

Comments Processed.

6/20/99
VIOLATION
FILE
16 CFR 1101.43

RE: CPSC sample 99-860-5295
"Crazy Ribbon" Party String

Dear Ms. Yu:

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 16, 1999 during an inspection of your establishment by Investigator Lori S. Person, a sample of 2 units "Crazy Ribbon" Party String was obtained from an inventory remaining of only the two units. Documentation obtained shows that you imported 242,064 units between February 10, 1999 and June 2, 1999.

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

Le Sa Yang Family, Ltd.
Page
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. We also are in need of the distribution information for this product promised to Investigator Person for delivery by July 23, 1999. Please direct your response to:

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

Le Sa Yang Family, Ltd.
Page

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 Report
FHSA and its Regulations

3

Le Sa Yang Family, Ltd.
Page

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 ..

4

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

Date: 7/21/99 7:55 AM

Normal

TO: <wporter@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: 99-860-5682: Crazy Ribbon

----- Message Contents

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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**U.S. Consumer Product Safety Commission
SAMPLE COLLECTION REPORT**

1. Sample Flag		2. Date Collected 7/20/99	3. Sample Type and Number: 99-860-5277 <input checked="" type="radio"/> Physical <input type="radio"/> Documentary	
4a. Product Name CRAZY STRING		4b Model 103119	4c NEISS 1133	5. Assignment Number 990630WRC1698
6. Complete for Import Samples Port of Entry: _____ Country of Origin: _____ Entry No. and Date: _____ Customs Contact: _____		7. MIS 31133	8. Hours Activity _____ 16 Travel _____ 4	
		9a Home RO FOWR	9b Collecting RO FOWR	
10. Sample Cost \$9.00		11. Invoice Value of Lot \$16.00		12. Size of Lot 21
				Units unt
13. Manufacturer/Importer # STE051 STEX ENTERPRISE, INC. 1282 FACTORY PL. LOS ANGELES, CA 90013		14. Shipper/Foreign Manufacturer AMERI-CHINA INTERNATIONAL 917 S. ALAMEDA ST. LOS ANGELES, CA 90021		15. Dealer/Import Broker # 22 CENTURY TOY CO. 204 BOYD ST. LOS ANGELES, CA 90013
16. Supporting documents attached: Invoice No. and Date: <u>972535</u> <u>4/19/99</u> Date Shipped: <u>4/20/99</u> Shipping Record and Date: _____ <u>4/20/99</u> Affidavit Signer's name, title and date: <u>GRACE QIAN, OWNER OF 22 CENTURY TOY, 7-20-99</u>				
17. Product Identification: Party spray ribbon substance in metal aerosol can 1 3/4" diameter and 6 1/2" tall with pink, yellow, orange, blue, or green plastic caps. Can is labeled in part: "***Crazy String***FOR PARTY CELEBRATION"				
18. Reason for collection/analysis needed: <input checked="" type="radio"/> FHSA <input type="radio"/> CPSA <input type="radio"/> FFA <input type="radio"/> PPPA <input type="radio"/> RSA Possible flammable spray. Test to FHSA aerosol flammability req.				
19. Summary of Field Screening: N/A				
20. Sample size/Method of Collection: 14 aerosol containers taken from the last box at the retail firm containing 21 total aerosol cans. Cans identified as in # 21, and as Subs # 1-14. Subs # 1-6 put in plastic bag sealed w/CPSC 164. Bag				
21. Identification on sample: 99-860-5277 SUBS # 1 - 14 COS 7/20/99		22. Identification on seal and date: "99-860-5277 Cecil O. Smith 7/21/99"		
23a. Sample delivered to: FEDEX LOS ANGELES CA		23b Date 7/21/99	24. Report/Record Sent to: FOWR	
25. Laboratory/Office: LSE ___ CCH ___ FPE ___ FTR ___ SIU ___ LSC <input checked="" type="checkbox"/> CHP <input checked="" type="checkbox"/> ELC ___ CLD ___ WHSE ___ Other <u>FOWR COMP</u>				
26. Remarks: (1) Sample held under lock and key until sealed w/CPSC 164 on 7-21-99. (2) Shipping records show Ameri-China International sold the Crazy String to Toy Palace Trading on 4-20-99. The Affidavit explains that				
27. Related Samples: None.				
28a Collector's name/title: Cecil O. Smith Resident Investigator		28b Collector's signature/date: <i>Cecil O. Smith</i> 7/21/99		
29a Reviewer's name/title:		29b Reviewer's signature/date:		

To CRC/CHP, F. Krivda

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PRODUCT IDENTIFICATION

S.E.Weight 120g***MADE IN TAIWAN***4713499 103119***".

METHOD OF COLLECTION

put in sealed metal gallon can put into a Hasmatpac shipping carton prepared for shipment. Sub # 7-12 prepared like Subs # 1-6. Subs # 13 & 14 were emptied of their contents. Sub # 13 sent to Frank Krivda, CRC/CHP. Sub # 14 sent to Norvan Allen, FOWR Compliance.

REMARKS

Toy Palace Trading is now out of business. 22 Century Trading now owns the Crazy String sold to Toy Palace Trading in April, 1999.
(3) The "[S.E.]" on the Crazy String aerosol can label stands for Stelex International.

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**U.S. Consumer Product Safety Commission
ASSIGNMENT REPORT**

990630WRC1698

Assign No 990630WRC1698	MIS Code 31133	Status Open	Assign Type Sample Collection	Region FOWR
Investigator Cecil O. Smith	Supervisor Keven J. Barton	Firm AMERI-CHINA INTERNATIONAL, INC. 917 S. ALAMEDA ST. LOS ANGELES, CA 90021		

Assign Date 6/30/99	Target Date 7/15/99	VICTIM INFORMATION	
Revised Target Date	Complete Date	City	State/Zip
		Product Description	CRAZY STRING
		Document Number	
		HIA No.	

Remarks

Assignment

Contact: Frank Krivda 301-504-0400 or Norvan

For your information FOWR recently seized 7 models of toy cellular phones, imported by this firm. Management may try to convince you these toy phones are safe.

Recently the Western Region collected a sample (99-860-5375) of Crazy Ribbon as a follow-up to an injury incident where the product ignited and caused severe burns to a child. The importer of the sampled product has identified other firms that are importing the same or similiar products.

Please visit this firm and sample all Crazy Ribbon/Crazy String or similiar products they market. Each sample should consist of 14 units. Send one unit, each, to Frank Krivda and Norvan and the remainder to LSHL for flammability testing. If 14 units are not on hand, collect whatever number is available.

Refer to collection report #99-860-5375 for further background.

**U.S. Consumer Product Safety Commission
SAMPLE COLLECTION REPORT**

1. Sample Flag		2. Date Collected 7/22/99	3. Sample Type and Number: 99-860-5279 <input checked="" type="radio"/> Physical <input checked="" type="radio"/> Documentary	
4a. Product Name CRAZY RIBBON SPRAY		4b Model 0806	4c NEISS 1133	5. Assignment Number 990630WRC1696
6. Complete for Import Samples Port of Entry: _____ Country of Origin: _____ Entry No. and Date: _____ Customs Contact: _____		7. MIS 31133	8. Hours Activity <u> 10 </u> Travel <u> 4 </u>	
10. Sample Cost \$10.00		11. Invoice Value of Lot \$120.00		12. Size of Lot 144
13. Manufacturer/Importer # STE051 STELEX ENTERPRISE, INC. 1282 FACTORY PL. LOS ANGELES, CA 90013		14. Shipper/Foreign Manufacturer MFG. BY TOP GREASE CO. LTD., TAIW		15. Dealer/Import Broker # Y2K NOVELTY, INC. 413 S. WALL STREET LOS ANGELES, CA 90013
16. Supporting documents attached: Invoice No. and Date: _____ Date Shipped: _____ Shipping Record and Date: _____ Affidavit Signer's name, title and date: _____				
17. Product Identification: Party spray substance in metal aerosol can 6 7/8" tall, with yellow, green, pink, or yellow caps, labeled in part: "CRAZY RIBBON" FOR PARTY CELEBRATION***NO CFCS***4712288 000806***Top Grease Co.				
18. Reason for collection/analysis needed: <input checked="" type="radio"/> FHSA <input type="radio"/> CPSA <input type="radio"/> FFA <input type="radio"/> PPPA <input type="radio"/> RSA Possible flammable spray. Test to FHSA flammability regs.				
19. Summary of Field Screening: N/A				
20. Sample size/Method of Collection: 12 aerosol cans taken from 144 total aerosol cans at firm. Cans identified as in # 21, and as Subs # 1-12. Subs # 1-6 put in plastic bag sealed w/CPSC 164. Bag put in gallon metal can with sealed lid.				
21. Identification on sample: "99-860-5279 SUBS # 1 - 12 COS 7/22/99"		22. Identification on seal and date: "99-860-5279 Cecil O. Smith 7/22/99"		
23a. Sample delivered to: FEDEX LOS ANGELES CA		23b Date 7/23/99	24. Report/Record Sent to: FOWR	
25. Laboratory/Office: LSE ___ CCH ___ FPE ___ FTR ___ SIU ___ Other <u>FOWR COMP.</u> LSC <u>X</u> CHP <u>X</u> ELC ___ CLD ___ WHSE ___				
26. Remarks: (1) Sample held under lock until sealed w/CPSC 164 on 7-22-99. (2) 12 units were collected, not 14, because the wholesale firm sells the Crazy Ribbon only in units of 12 each (doz.). Subs 13 & 14 are				
27. Related Samples: None.				
28a Collector's name/title: Cecil O. Smith Resident Investigator		28b Collector's signature/date: <i>Cecil O. Smith</i> 7/22/99		
29a Reviewer's name/title:		29b Reviewer's signature/date:		

To CRM/CHP, Krivda

a

PRODUCT IDENTIFICATION

Ltd.***MADE IN TAIWAN***120g***".

METHOD OF COLLECTION

Metal can put in Hasmatpac shipping carton w/CPSC 165, and prepared for shipment. Subs # 7-12 prepared likewise. Subs # 13 & 14 are documentary photos of the aerosol can and it's labeling. Sub # 13 was sent to CRC/CHP, F. Krivda. Sub # 14 was sent to FOWR Compliance, Norvan Allen.

REMARKS

documentary photos of the Crazy Ribbon aerosol cans.

(3) The Crazy Ribbon was purchased from Stelex Enterprises in Los Angeles, CA. Records will be obtained later from management.

(4) Send lab results to Mr. Kang Tsan, President, of Y2K Novelty, Inc.

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Sample 99-860-5279 (documentary)
7-22-99, COS, SUB # 13

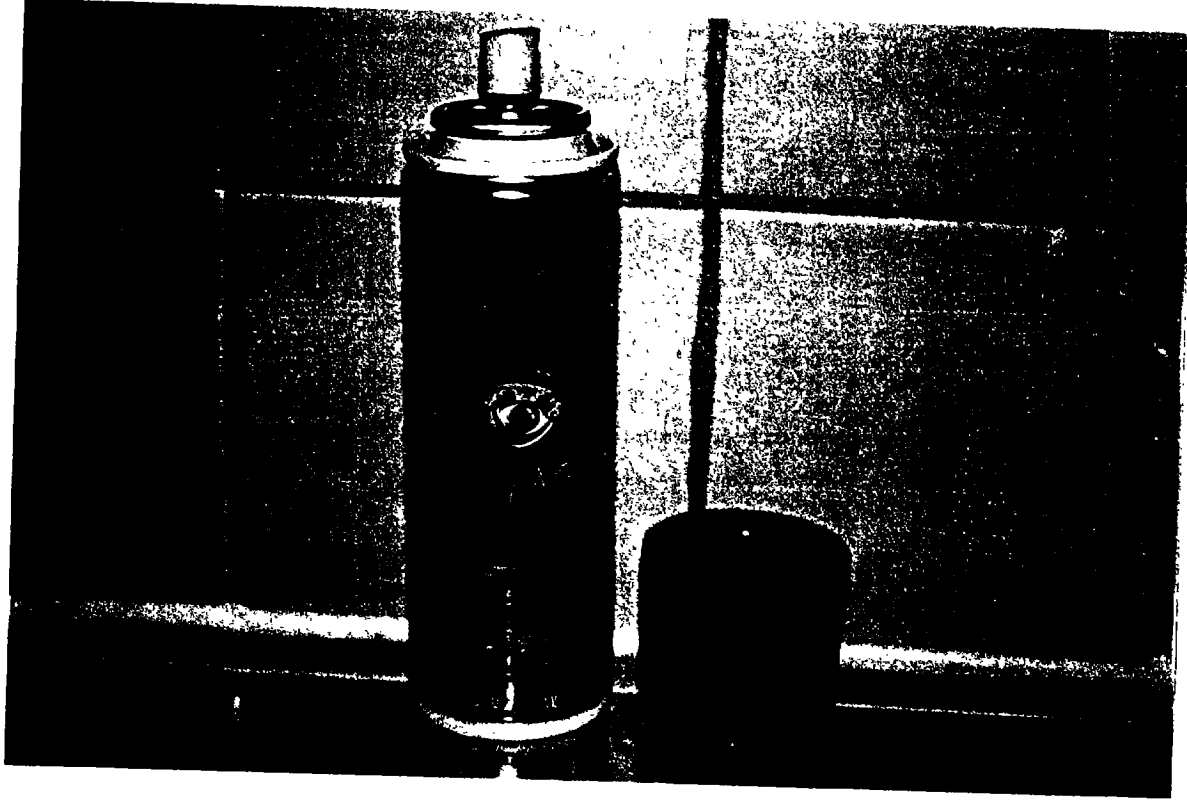
6⁷/₈" tall aerosol can containing party spray substance, with yellow, green, pink, or orange caps, labeled: "CRAZY RIBBON", "FOR CELEBRATION AND DECORATION", "NO CFCs OZONE SAFE", "Top Grease Co. Ltd. MADE IN TAIWAN 120g", "CAUTION: Do not contact to eyes. Pressurized container. Must be kept out of sun and do not expose to temperatures above 50°C (120°F). Do not pierce or burn even after use. Do not spray on flame or incandescent object.", "INSTRUCTION: 1. Shake well before use. 2. In case of cold weather warm this can until temperature is above 20°C / 68°F for use. 3. In case of malfunction, take off the nozzle and clean it with a pin or sharp object. Put the nozzle back on again.", "471288 000806".



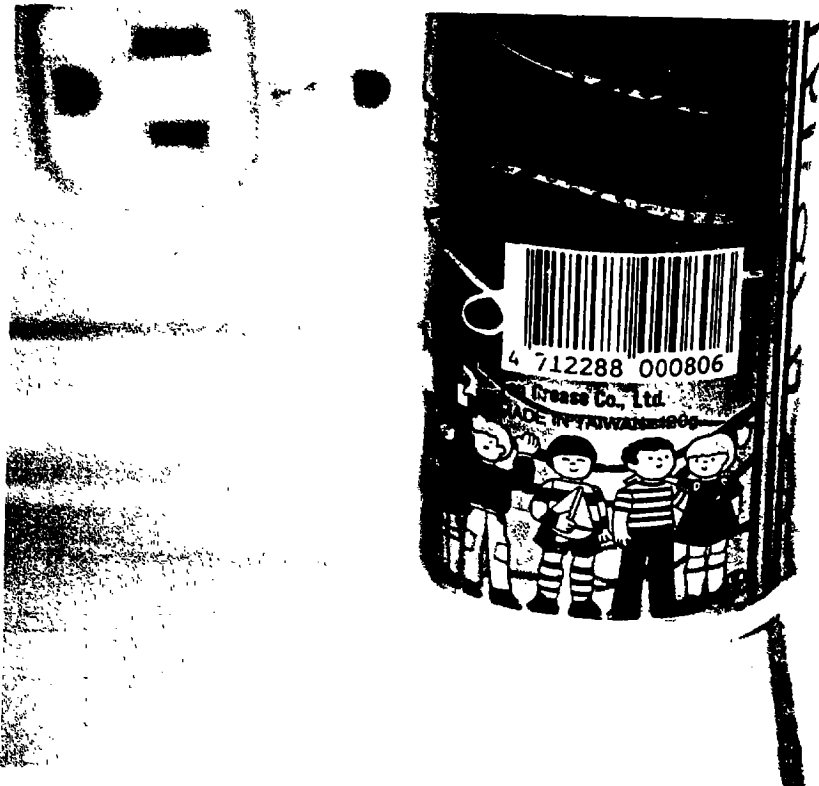
Front panel
of aerosol party
spray can.

((

Sample 99-860-5279 (documentary)
7-22-99, COS, SUB #13



Front
panel -
cap
removed.



Rear
panel -
Mfg. Name
and U.P.C
code.

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**U.S. Consumer Product Safety Commission
ASSIGNMENT REPORT**

990630WRC1696

Assign No 990630WRC1696	MIS Code 31133	Status Open	Assign Type Sample Collection	Region FOWR
Investigator Cecil O. Smith	Supervisor Keven J. Barton	Firm 28 ANGELS CO. Y2K Novelty, Inc. 413 S. WALL STREET LOS ANGELES, CA 90013 (213/621-3104)		
Assign Date 6/30/99	Target Date 7/15/99	VICTIM INFORMATION Kang Tsan, Prada		
Revised Target Date	Complete Date	City	State/Zip	Product Description CRAZY STRING
		Document Number		
		HIA No.		

Remarks

Assignment

Contact: Frank Krivda 301-504-0400 or Norvan

This assignment involves two sample requests. However, this is our first contact with this firm. Please obtain the names of responsible individuals and phone and fax numbers.

The first request is for Crazy String. Recently the Western Region collected a sample (99-860-5375) of Crazy Ribbon as a follow-up to an injury incident where the product ignited and caused severe burns to a child. The importer of the sampled product has identified other firms that are importing the same or similiar products.

Please visit this firm and sample all Crazy Ribbon/Crazy String or similiar products they market. Each sample should consist of 14 units. Send one unit, each, to Frank Krivda and Norvan and the remainder to LSHL for flammability testing. If 14 units are not on hand, collect whatever number is available.

Refer to collection report #99-860-5375 for further background.

The second request is for toy cellular phones, with antennas and keypads that activate voice, music and other sound effects. The presence of the sound effects influenced Human factors in considering these toys as intended for children 19-36 months. Several such toy cellular phones were recently seized as presenting High hazards of choking and aspiration when the antennas broke off the toys. Sample any such toy cellular phones you may find at this firm. Collect 14 units and send 1 each to Human factors and Norvan. the remaining are to be sent to LSE through the sample custodian.

****FOR OFFICIAL USE ONLY****

PRODUCT SAFETY ASSESSMENT (PSA) TECHNICAL EVALUATION REQUEST

PSA ACTION (FOR PSA COORDINATOR USE ONLY)
PSA Number:

Date Processed

Requested by	Lawrence S Blend	Org Code.	Field Off	FOWR	Date Requested
Date Submitted	July 22, 1999	Priority.	b	Case #	99-860-5290 et al

Requested Completion Date. July 29, 1999

PRODUCT INFORMATION:

Manufacturer	Le Sa Yang Family, Ltd. (Importer)	City:	Diamond Bar	Ca.	Assigned to Organization:
Product.	"Crazy Ribbon" party string in 6" high aerosol cans	NEISS Code:	1133	State:	Technical Off.

Brand name, model, etc.: Made in Taiwan

Sample number: 99-860-5295

Sample Disposition.	Return to Requester	Store at Whs.	Other:
---------------------	---------------------	---------------	--------

IDI Number N/A

EVALUATION REQUESTED Please do a data search for incidents/injuries/deaths, especially related to fire burns

Comments The product is in violation of FHSA and the firm has agreed to a voluntary recall to the consumer level

EPI ASSESSMENT. Dates.	To	Sort by Mfg.:	Yes	No
------------------------	----	---------------	-----	----

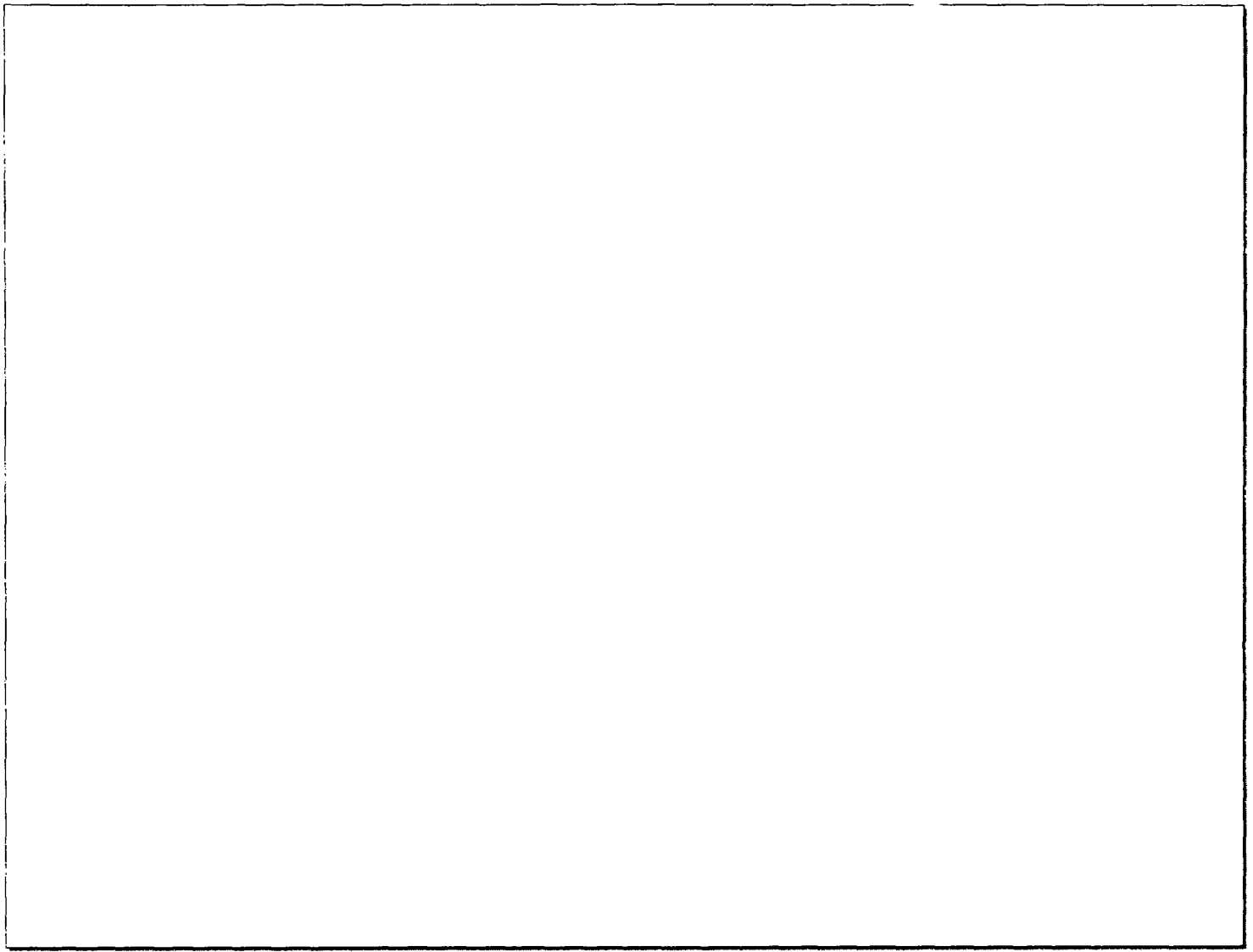
From:	IDI	IPII	NEISS Comments	NEISS Estimates	Deaths	NFIRS
-------	-----	------	----------------	-----------------	--------	-------

HAZARD: Burn hazard

HAZARD CODE: 32103

LOCATIONS OF	Samples: Sample Custodian	Files: Larry Blend	(MSWordRev 1/99 rp/jb/bh)
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14



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****FOR OFFICIAL USE ONLY****				PSA ACTION (FOR PSA COORDINATOR USE ONLY)	
PRODUCT SAFETY ASSESSMENT (PSA) TECHNICAL EVALUATION REQUEST				PSA Number	
				Date Processed:	
Requested by: Lawrence S Blend	Org Code	Field Off: FOWR	Date Requested		
Date Submitted: July 22, 1999	Priority: b	Case #: 99-860-5290 et al	Due Date		
Requested Completion Date: July 29, 1999					
PRODUCT INFORMATION:				Assigned to	
Manufacturer: Major Import, Inc (Importer)	City: Whittier	State: Ca	Organization		
Product: "Crazy Ribbon" party string in 6" high aerosol cans	NEISS Code: 1133	Technical Off			
Brand name, model, etc.: Made in Taiwan				Request Summary	
Sample number: 99-860-5290/1/2/3/4					
Sample Disposition	Return to Requester	Store at Whs	Other		
IDI Number: N/A					
EVALUATION REQUESTED. Please do a data search for incidents/injuries/deaths, especially related to fire burns				Comments: The product is in violation of FHSA and the firm has agreed to a voluntary recall to the consumer level	
EPI ASSESSMENT Dates: To:		Sort by Mfg: Yes		No	
From:					
IDI	IPII	NEISS Comments	NEISS Estimates	Deaths	NFIRS
HAZARD: Burn hazard			HAZARD CODE: 32103		
LOCATIONS OF		Samples: Sample Custodian	Files: Larry Blend		(MSWordRev 1/99 rp/jb/bh)

18

Author: Ronald G. Yelenik at CPSC-HQ2
Date: 7/23/99 2:26 PM
Normal
Receipt Requested
TO: Larry S. Blend at CPSC-HQ1, Frank
Subject: Crazy Ribbon and Crazy String
----- M

ivda
e Contents

PRIVILEGED AND CONFIDENTIAL

LARRY, per your telephone message, I am inclined to wait with the issuance of the letter until we receive the test results regarding Crazy String. If the product proves to be safe relative, you guys can prepare an LOA and consolidate it with my letter. My only caveat is that we not wait too long in sending the letter. My understanding is that we will receive the test results by next week. Is that correct?

I am inclined to wait with the issuance of the letter until we receive the test results regarding Crazy String. If the product proves to be safe relative, you guys can prepare an LOA and consolidate it with my letter. My only caveat is that we not wait too long in sending the letter. My understanding is that we will receive the test results by next week. Is that correct?

Thanks,
1

Author: Larry S. Blend at cpssc-hq1

Date: 7/24/99 10:17 AM

Normal

Receipt Requested

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

CC: Norvan K. Allen at cpssc-hq1, Frank J. Nava at cpssc-hq1, Larry G. Cornell at cpssc-hq1

Subject: Re: Crazy Ribbon and Crazy String
----- Message Contents

Warren: We shall have results next week, won't we?

Reply Separator

Subject: Crazy Ribbon and Crazy String

Author: Ronald G. Yelenik at CPSC-HQ2

Date: 7/23/99 2:26 PM

PRIVILEGED AND CONFIDENTIAL

LARRY, per your telephone message, I am inclined to wait with the issuance of the letter until we receive the test results regarding Crazy String. If the product proves violative, you guys can prepare an LOA and consolidate it with my letter. My only caveat is that we not wait too long in sending the letter. My understanding is that we will receive the test results by next week. Is that correct?

Thanks,

on

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

Date: 7/22/99 8:35 AM

Normal

TO: "Warren Porter" <wporter@cpsc.gov> at internet-mail

CC: "Frank Krivda" <fkrivda@cpsc.gov> at internet-mail,

"Keven Barton" <kbarton@cpsc.gov> at internet-mail,

"Lawrence Blend" <lblend@cpsc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: Crazy String aerosol sample.

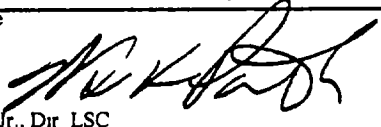
----- Message Contents

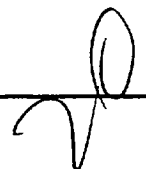
Warren -----



Sample 99-960-5277, 12 aerosol cans of Crazy String split inside two Hasmatpac shipping cartons, will arrive at the Sample Custodian this morning. Larry Blend, FOWR Compliance, has asked that the sample analysis for flammability be given high priority to support the current compliance actions against the importer of the Crazy String - Stelex Enterprises.

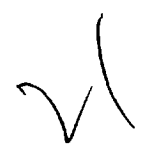
Cecil.....

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LABORATORY/COMPLIANCE SUMMARY		Sample Number: 99-860-5295	
2. Laboratory Summary: Crazy Ribbon Party Streamer (aerosol) Flammability 16 CFR 1500.45 Flame extension: All units were tested in the upright, horizontal and inverted positions. Upright, shaken and unshaken; All units displayed flame extension in excess of 18 inches, streamer can travel at least 6 feet and continues to burn. Horizontal; Shaken and unshaken; ^{All} Some units showed flame extension and flash back, ^{up 7/92} others did not . Inverted; None of the units showed flame extension or flash back. Composition; The major solvent/propellant was identified as Dimethyl Ether by GC/MS			
Original to: FOWR Blend ; Copies to : LSC, CE – Krivda, FOWR N. Allen			
3. Name and Title  Warren K. Porter, Jr., Dir. LSC		Date: July 22, 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:	



LABORATORY REPORT	1. PRODUCT: Crazy Ribbon, Party Spray	2. SAMPLE NUMBERS: 99-860-5295
3. SEALS: Intact	4. DATE REC: 7/20/99	5. LABORATORY: LSC
6. SAMPLE DESCRIPTION: 2 units were received in plastic bags. Sample had the following information: "99-860-5290, Lori S. Person, 7/19/99".		
7. LABELING: N/A	8. CUSTOMS ENTRY NO: N/A	9. LOT/MODEL#:
10. PRODUCT DESCRIPTION: Crazy Ribbon, the product sprays 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, both units showed flame extensions greater than 18 inches and flash back to the nozzle. In the inverted position, neither of the units tested showed flashback or flame extensions. In the sideways position, both units showed flashback and flame extension greater than 18 inches. 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 7/22/99	
14a CHECK ANALYST SIGNATURE	14b DATE	
15a REPORT CHECKED BY 	15b DATE 7/22/99	



**Flammability Testing
CFR 16 Section 1500.45**


Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5295-01	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5295-02	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5682-02	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5682-04	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5682-07	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5682-12	U	Upright	Y	Y	
		Sideways	N	N	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.

99-860-5295
DC
7/20/99

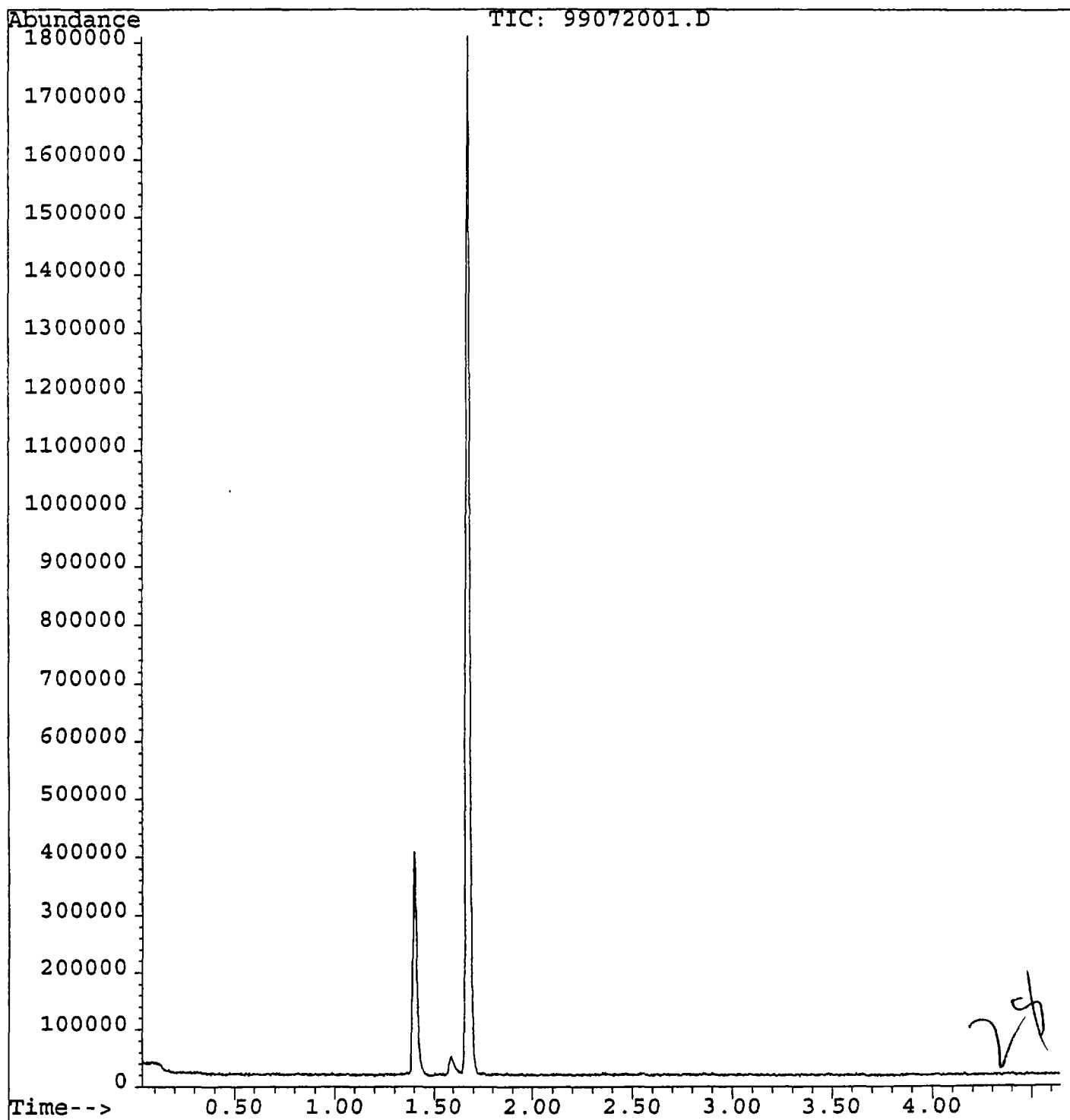
U.S. CONSUMER PRODUCT SAFETY COMMISSION	
	
SAMPLE NO. 99-860-5295	DATE 7-19-99
SIGNATURE <i>Law S. Pearson</i>	
PRINT NAME & TITLE (CPSC REPRESENTATIVE) LAW S. PEARSON, PST	
SEAL BROKEN BY <i>R</i>	
DATE 7/20/99	

CPSC FORM 164

✓

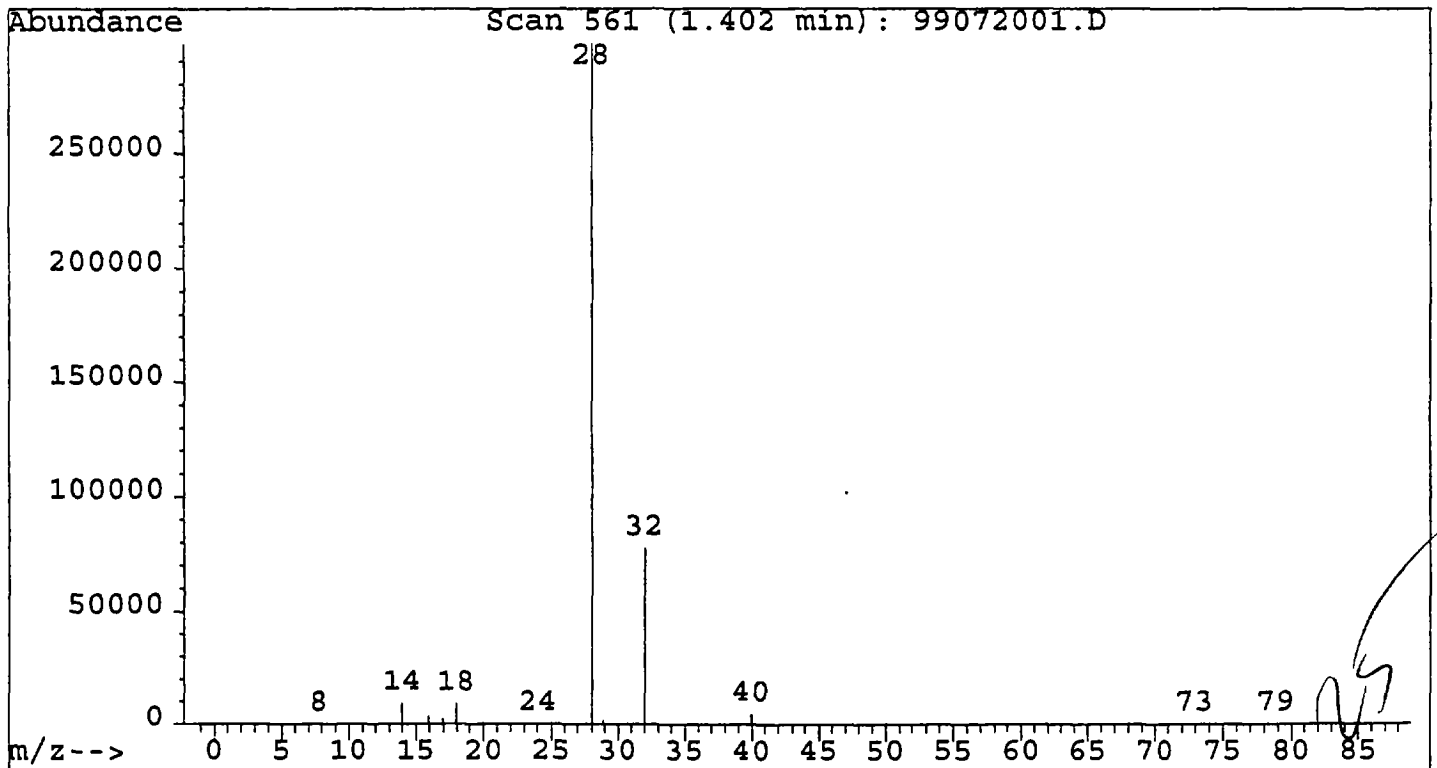
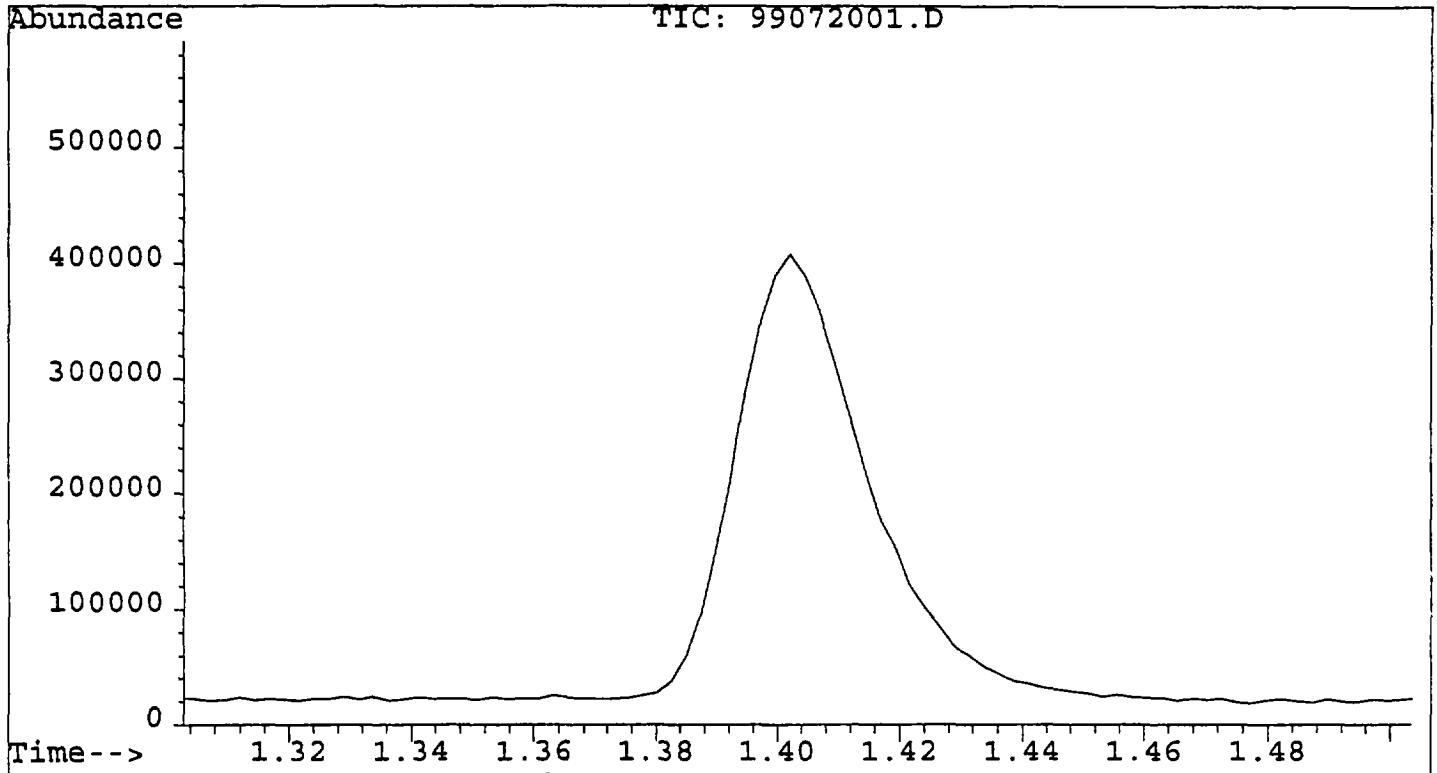
99-860-5270
DC
7/21/99

File : C:\HPCHEM\1\DATA\99072001.D
Operator : Bhavi
Acquired : 20 Jul 99 1:09 pm using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5295-01
Misc Info : 35 deg isothermal
Vial Number: 1



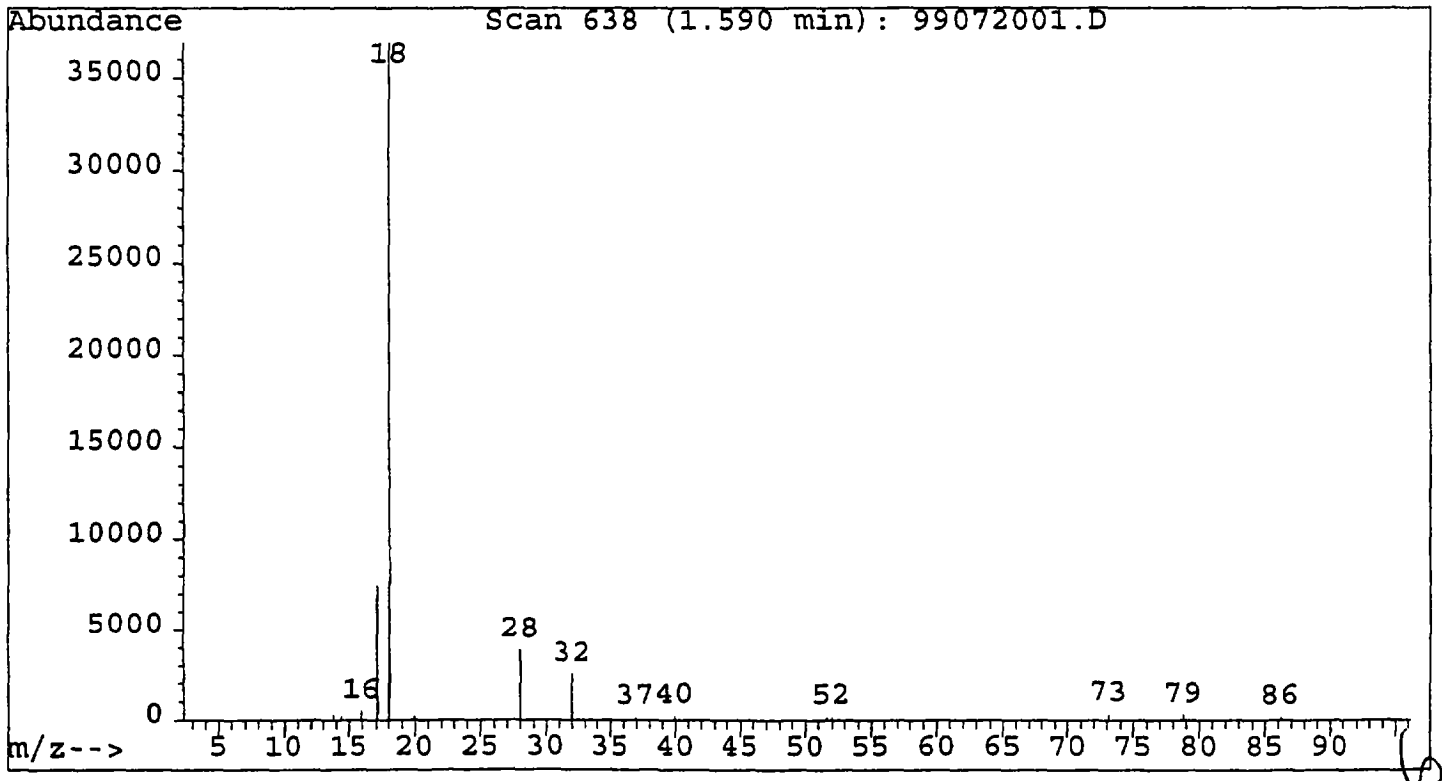
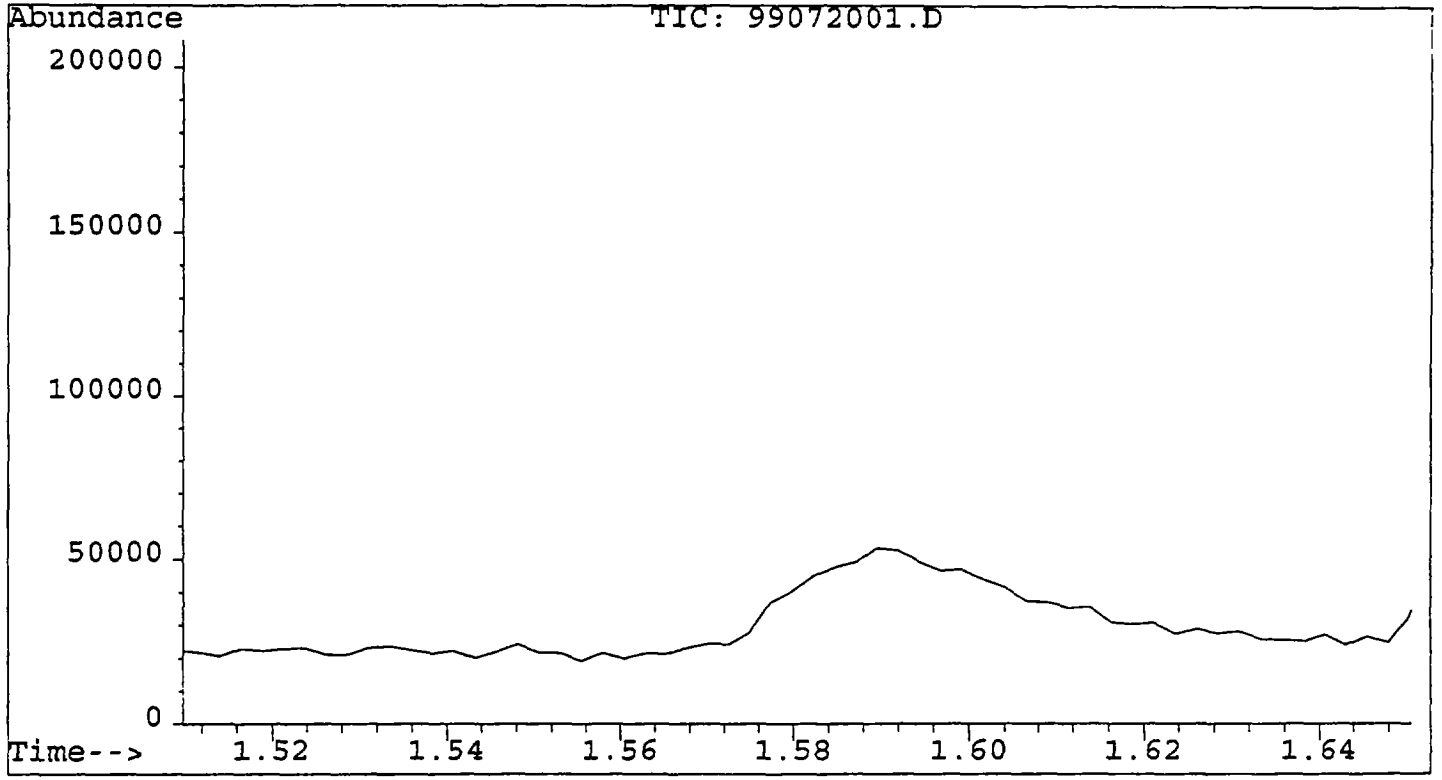
77-860-5295
DC
7/21/99

File : C:\HPCHEM\1\DATA\99072001.D
Operator : Bhavi
Acquired : 20 Jul 99 1:09 pm using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5295-01
Misc Info : 35 deg isothermal
Vial Number: 1



99-860-5073
DC
7/21/99

File : C:\HPCHEM\1\DATA\99072001.D
Operator : Bhavi
Acquired : 20 Jul 99 1:09 pm using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5295-01
Misc Info : 35 deg isothermal
Vial Number: 1



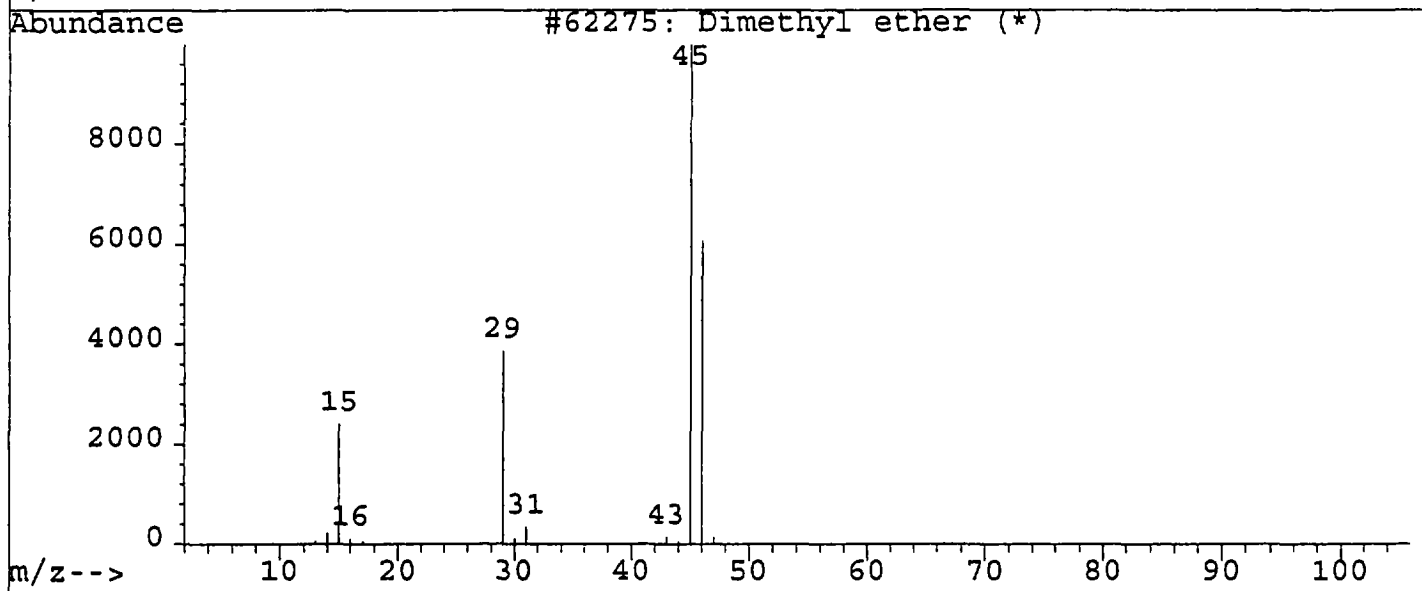
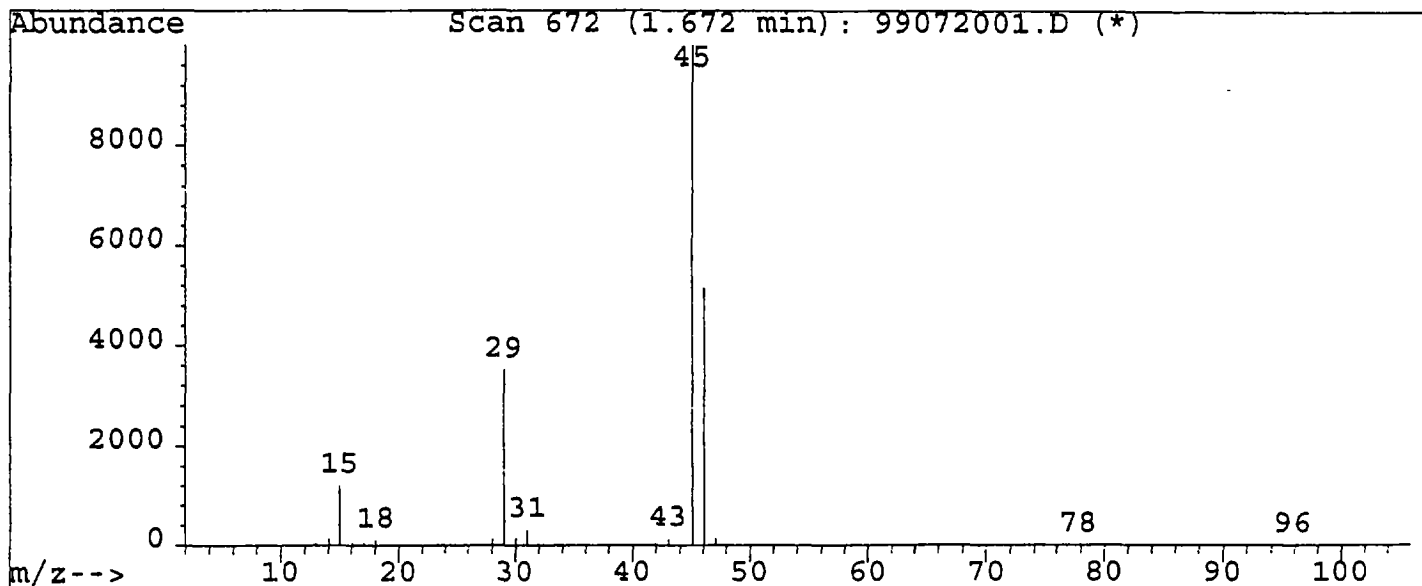
✓

99-860-5295

DC

7/21/99

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



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LABORATORY/COMPLIANCE SUMMARY

Sample Number:
99-860-5682

2. Laboratory Summary: Crazy Ribbon Party Streamer (aerosol)

Flammability 16 CFR 1500.45

Flame extension:

All units were tested in the upright, horizontal and inverted positions.

Upright, shaken and unshaken; All units displayed flame extension in excess of 18 inches, streamer can travel at least 6 feet and continues to burn (see enclosed video tape).

Horizontal; Shaken and unshaken; Some units showed flame extension and flash back, others did not.

Inverted; None of the units showed flame extension or flash back.

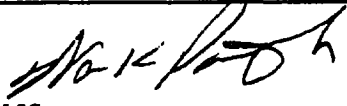
Composition; The major solvent/propellant was identified as Dimethyl Ether by GC/MS

FILE COPY

Original to: FOWR Blend ; **Copies to :** LSC, CE - Kivda, FOWR N. Allen

3. Name and Title

Date:



July 22, 1999

Warren K. Porter, Jr., Dir. LSC

4. Firm Name: _____; Product: _____

City, State: _____; Model#: _____

5. Compliance Assessment:

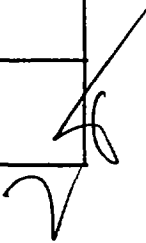
Note Video tape sent to L. Blend.

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: 99-860-5682
3. SEALS: Intact	4. DATE REC: 7/20/99	5. LABORATORY: LSC
6. SAMPLE DESCRIPTION: 12 units were received in plastic bags. Sample had the following information: "99-860-5291, Lori S. Person, 7/19/99".		
7. LABELING: N/A	8. CUSTOMS ENTRY NO: N/A	9. LOT/MODEL#:
10. PRODUCT DESCRIPTION: Crazy Ribbon, the product sprays 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>Paul Hall</i>	13b DATE 7/21/99	
14a CHECK ANALYST SIGNATURE	14b DATE	
15a REPORT CHECKED BY <i>LSP</i>	15b DATE 2/22/00	



**Flammability Testing
CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5295-01	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5295-02	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5682-02	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5682-04	U	Upright	Y	Y	
		Sideways	Y	N	Flame extension briefly, but candle flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5682-07	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5682-12	U	Upright	Y	Y	
		Sideways	N	N	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.

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99-860-5682
DC
7/20/99

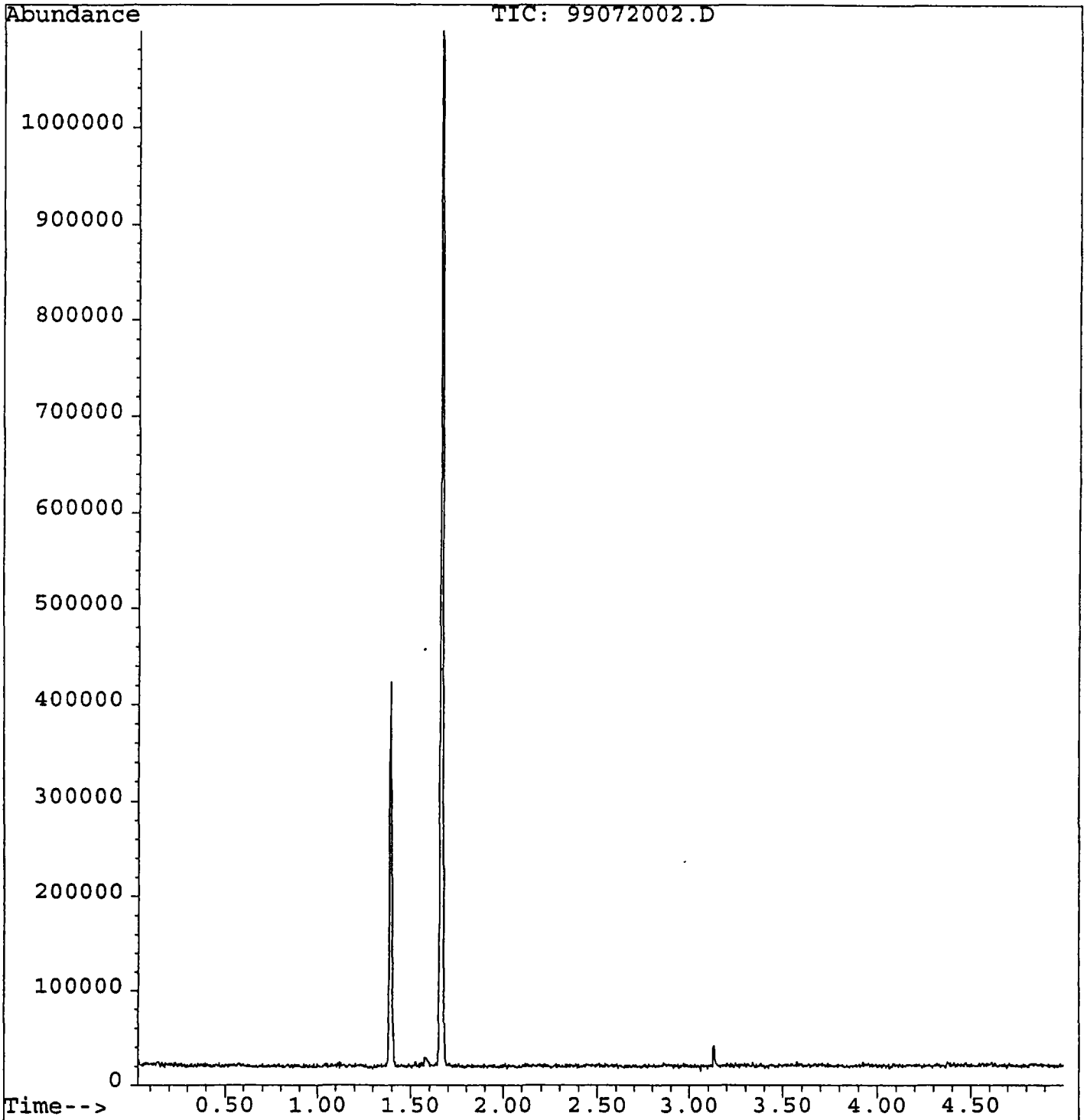
U.S. CONSUMER PRODUCT SAFETY COMMISSION	
LOS	
	
SAMPLE NO. 99-860-5682	DATE 7-99
SIGNATURE <i>[Signature]</i>	
PRINT NAME & TITLE (OR CPSC REPRESENTATIVE) Tosun Du	
SEAL BROKEN BY Q	
DATE 7/20/99	

CPSC FORM 164

[Handwritten mark]

77-000-000
DC
7/21/99

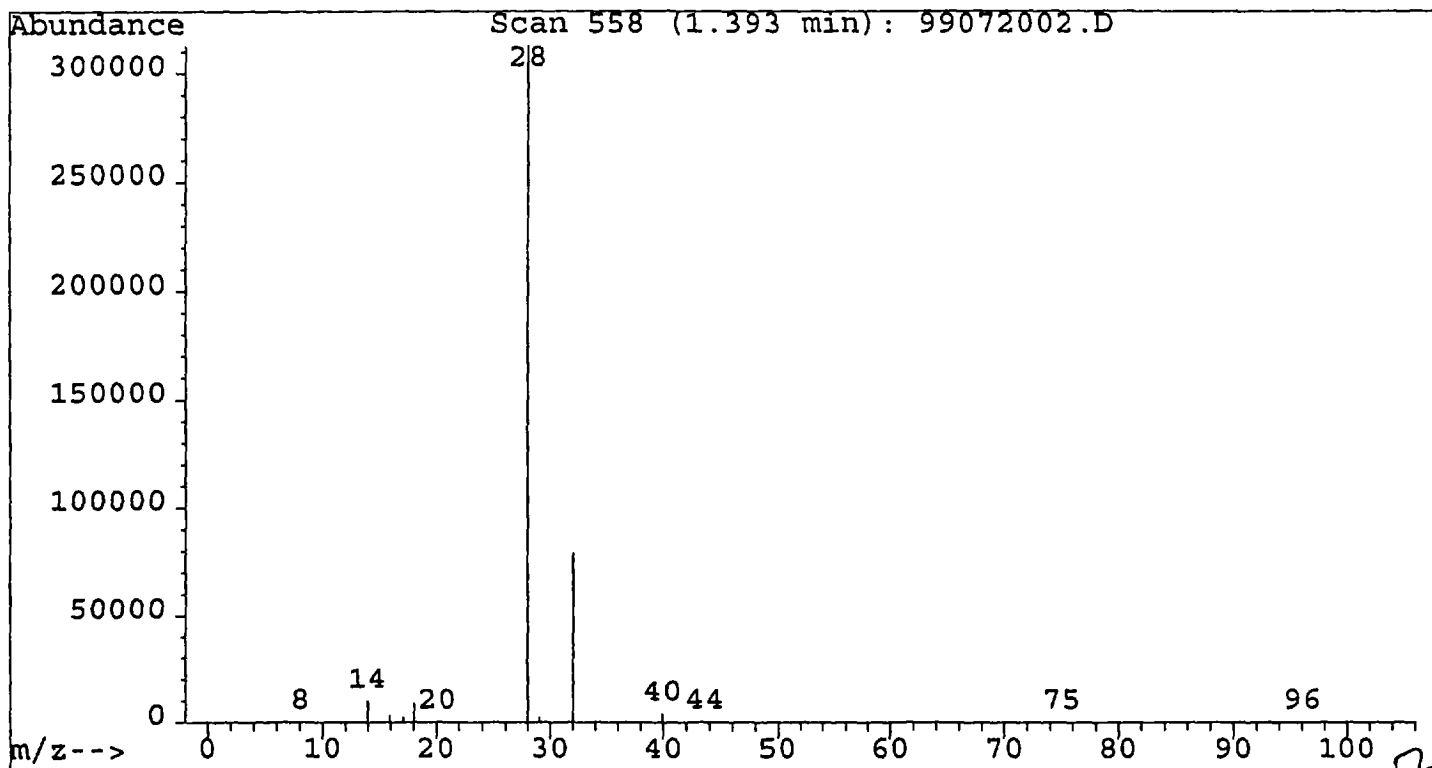
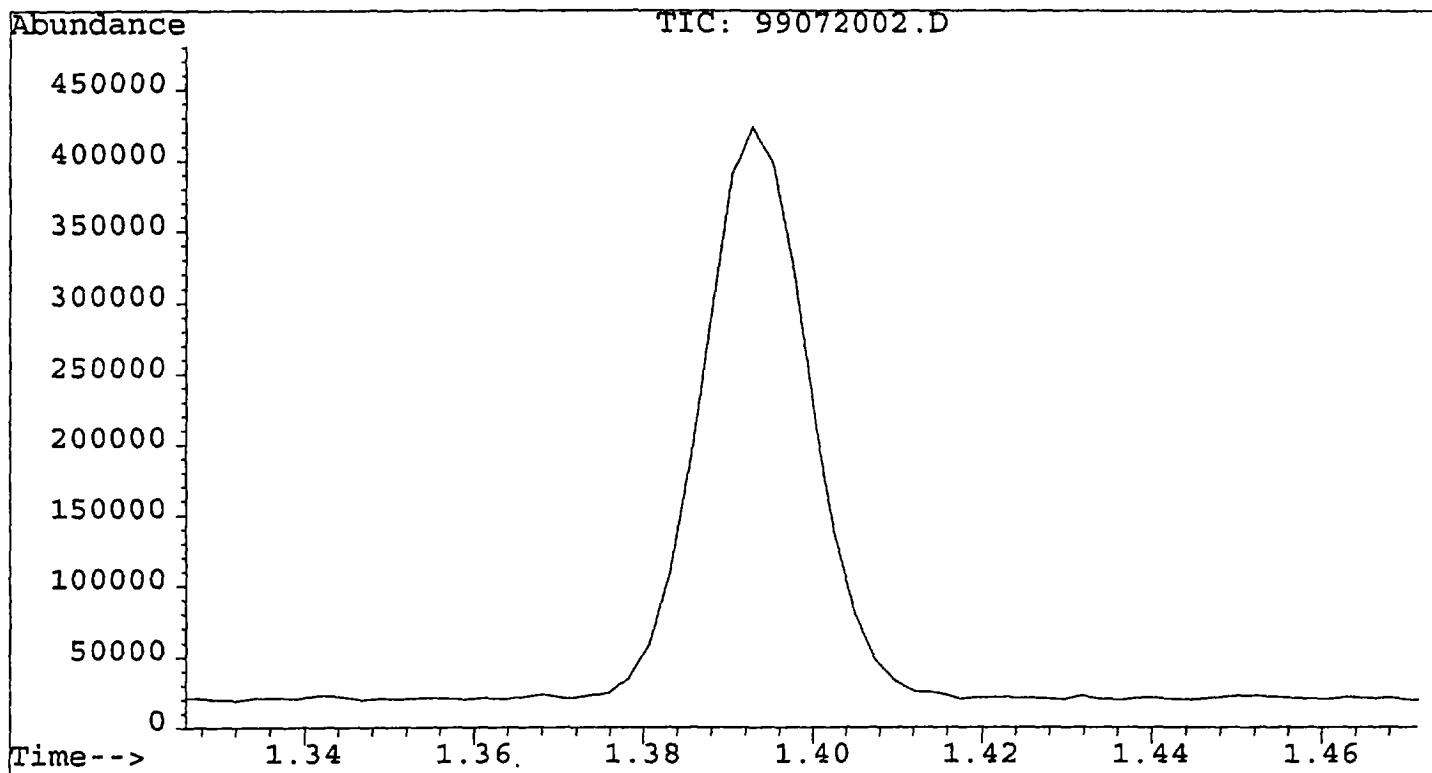
File : C:\HPCHEM\1\DATA\99072002.D
Operator : Bhavi
Acquired : 20 Jul 99 1:19 pm using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5602-01
Misc Info : 35 deg isothermal
Vial Number: 1



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File : C:\HPCHEM\1\DATA\99072002.D
Operator : Bhavi
Acquired : 20 Jul 99 1:19 pm using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5602-01
Misc Info : 35 deg isothermal
Vial Number: 1

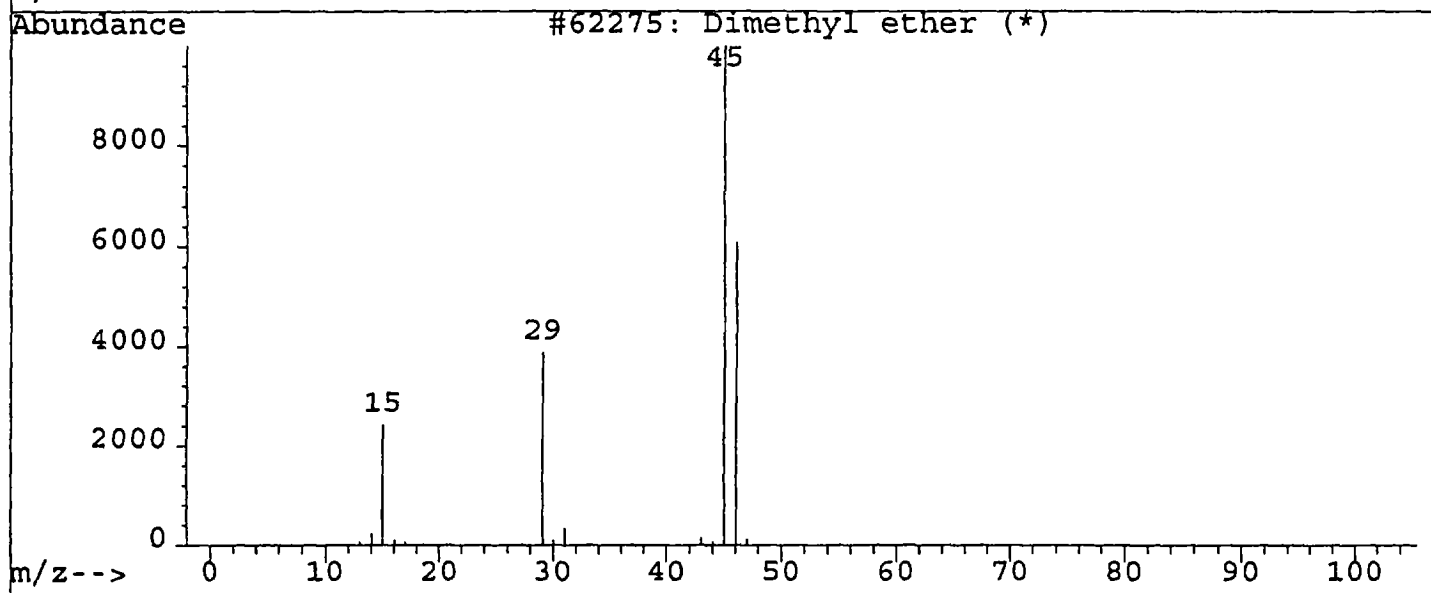
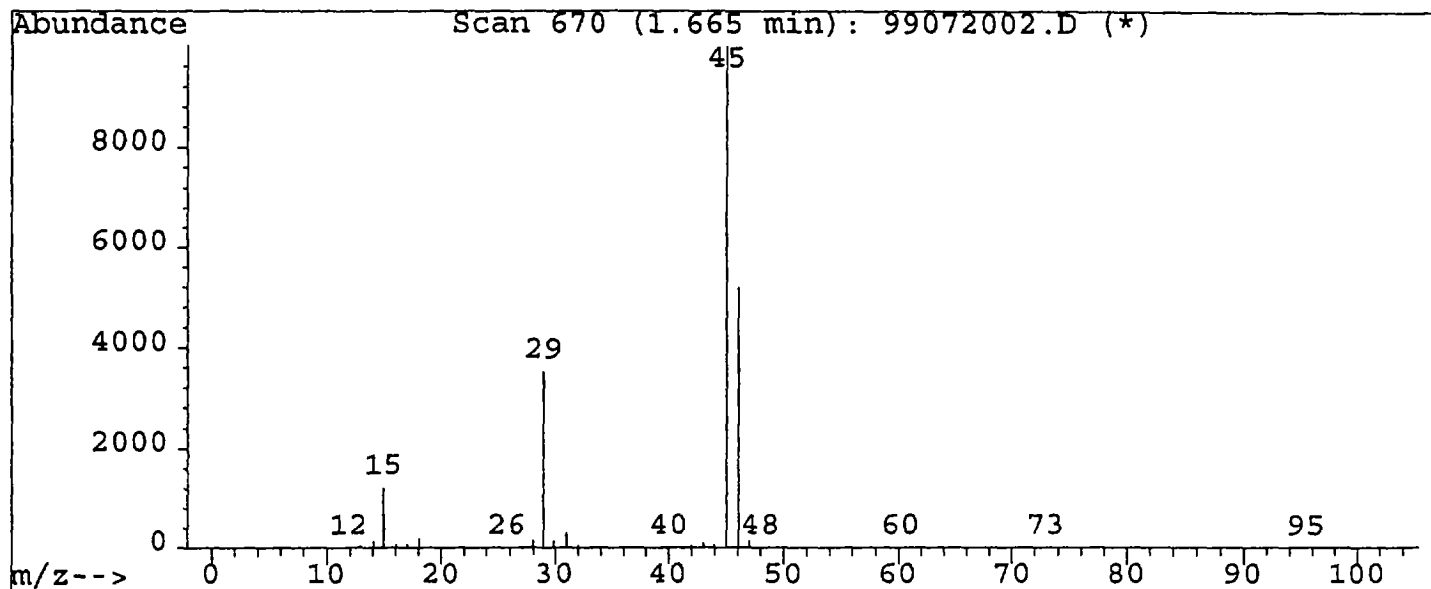
99-860-5602
DC
7/21/99



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Library Searched : C:\DATABASE\NBS75K.L
Quality : 80
ID : Dimethyl ether

0c
7/21/99



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