



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

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MEMORANDUM

DATE : June 12, 2000
TO : HS
Through: Sadye E. Dunn, Secretary
FROM : Martha Kosh
SUBJECT: Petition HP 00-3 Requesting a Ban of Candle
Wicks Containing Lead and of Candles Containing
Such Wicks

ATTACHED ARE COMMENTS ON THE CH 00-3

<u>COMMENT</u>	<u>DATE</u>	<u>SIGNED BY</u>	<u>AFFILIATION</u>
CH 00-3-1	4/12/00	Marianne Cline	1102 Coventry Dr. Thousand Oaks, CA 91360
CH 00-3-2	3/09/00	Russell Train	World Wildlife Fund 1250 24 th St, NW Washington, DC 20037
CH 00-3-3	3/15/00	Howard Hu MD, MPH, Sc.D Assoc Professor Of Occupational Health	Harvard School of Public Health 665 Huntington Ave Boston, MA 02115
CH 00-3-4	5/24/00	Eileen Lee Ph.D Vice President Of Enviroment	National Multi Housing Council National Apartment Association Suite 540 1850 M St. NW Washington, DC 20036
CH 00-3-5	5/27/00	Ruby Two	ruby2_57@yahoo.com
CH 00-3-6	6/01/00	Ron Holmes	chinadoc@jps.net
CH 00-3-7	6/01/00	Don Paladin	DonPaladin@aol.com
CH 00-3-8	6/01/00	Eagle Nest	airc0mbat0@hotmail.com

Petition HP 00-3 Requesting a Ban of Candle Wicks Containing Lead
and of Candles Containing Such Wicks

CH 00-3-9	6/05/00	J.D. Jackson	<u>Shammahs.bean.field@htcomp.net</u>
CH 00-3-10	6/05/00	Alison Stewart	<u>torquill@foogod.com</u>
CH-00-3-11	6/12/00	Don Ryan Exe. Director	Alliance to End Childhood Lead Poisoning 227 Massachusetts Ave, NE, Suite 200 Washington, DC 20002
CH 00-3-12	6/06/00	Nancy Anderson	<u>nla@mint.net</u>
CH 00-3-13	6/06/00	Karen Bowen	<u>karen.l.bowen@ac.com</u>
CH 00-3-14	6/06/00	John Roberts M.S., P.E.	Engineering Plus, Inc. 818 207 th Ave., NE Redmond, WA 98053
CH 00-3-15	6/06/00	Richard Rabin	Task Force on Lead Poisoning 8 Sawin St. Arlington, MA 02474
CH 00-3-16	6/06/00	Betty Bridges RN	12602 Reed Rock Rd. Amelia, VA 23002
CH 00-3-17	6/07/00	John Hausbeck M.S., R.S.	Madison Dept. of Public Health Madison, WI
CH 00-3-18	6/07/00	Barry Castleman Sc.D	2412 Pickwick Rd. Baltimore, MD 21207
CH 00-3-19	6/07/00		<u>rkjfabf@aol.com</u>
CH 00-3-20	6/07/00	Megan Sandel MD	91 E Concord St, 4 th Fl Boston, MA 02118
CH 00-3-21	6/07/00	C. Archambault, M.D.	<u>CONARCH@aol.com</u>
CH 00-3-22	6/07/00	Tom Neltner	Improving Kids' Environment 5244 Carrollton Ave. Indianapolis, IN 46220

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CH 00-3-23	6/07/00	Jerome Paulson MD, Associate Professor of Medicine, Pediatrics and Community Health	George Washington Univ. 2150 Pennsylvania Ave, NW, Washington, DC 20037
CH 00-3-24	6/07/00	Kathy Dorn	activenow@hotmail.com
CH 00-3-25	6/08/00	Paul Lutz	PELPLA@aol.com
CH 00-3-26	6/08/00	G. Craig, P.E.	CraigG@FAC UNC.EDC
CH 00-3-27	6/08/00	Peter Wood	Pandemonium@icon.co.za (South Africa)
CH 00-3-28	6/07/00	M. Borgialli MP.H., M.S.W. & D. Borgialli MP.H, D.O.	Michigan Department of Community Health
CH 00-3-29	6/08/00	Janine Melrose	P.O. Box 2885 La Crosse, WI 54602
CH 00-3-30	6/08/00	Robin S.	ris63@hotmail.com
CH 00-3-31	6/08/00	James Diamond M.D., Fellow, American Academy Of Pediatrics	JMDia@aol.com Berkeley, CA 94703
CH 00-3-32	6/08/00	Charles Miller Ph.D, Associate Professor of Environmental Health Sciences	Tulane Univ. School of Public Health and Tropical Medicine 1430 Tulane Ave. New Orleans, LA 70112
CH 00-3-33	6/08/00	Nancy Harrison	jnharr@gte.net
CH 00-3-34	6/08/00	Kip Flanders	kflanders@ntscdallas.com
CH 00-3-35	6/08/00	Loring Pitts	loringp@sprintmail.com
CH 00-3-36	6/09/00	Pam Smith	psmith@ntscdallas.com
CH 00-3-37	6/09/00	Tom McGrath	Tom.McGrath@ps.net
CH 00-3-38	6/10/00	Linda J. McElver	1930 Castillo Ct. San Luis Obispo, CA

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CH 00-3-39	6/09/00	Jena Roberson	<u>jenaroberson@hotmail.com</u>
CH 00-3-40	6/09/00	S. Weaver	<u>Susan.Weaver@mail.state.ky.us</u> (Kentucky Division for Air Quality)
CH 00-3-41	6/10/00	Mary Pjerrou President	Redwood Coast Watersheds Alliance P.O. Box 90 Elk, CA 95432
CH-00-3-42	6/10/00	Julia Carson Member of Congress, CD 10 Indiana	300 East Fall Creek Parkway, N. Drive Indianapolis, IN 46205
CH-00-3-43	6/10/00	Tom Johnson	<u>tsjohnson@celanese.com</u>
CH-00-3-44	6/11/00	Debra Goodin-Wellever	<u>drh1998@earthlink.net</u>
CH-00-3-45	6/11/00	Kent Roecker	<u>jroeker@airmail.net</u>
CH-00-3-46	6/11/00	Connie Ho	47 Maple Hill Dr. Chagrin Falls, OH 44022
CH-00-3-47	6/11/00	Tim Wallace R.S.	2055 Thomasville Rd, #A202 Tallahassee, FL 32312
CH-00-3-48	6/11/00	Steven Roth, M.D.	2 Barlett Rd Stratham, NH
CH-00-3-49	6/11/00	Hollie Hoffman	340 Sunset Dr, #607 Fort Lauderdale, FL
CH-00-3-50	6/11/00	Phil Goodrum Ph.D	Environmental Science Center Syracuse Research Corp 6225 Running Ridge Rd. N. Syracuse, NY 13212
CH-00-3-51	6/11/00	Kathy Van Dame	Wasatch Clean Air Coalition 1148 East 6600 South #7 Salt Lake City, UT 84121
CH-00-3-52	6/12/00	Sarah Johnston	661 Lansing Rd. Fultonville, NY 12072

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CH-00-3-53	6/12/00	Kim Harvey	<u>kh8326@txmail.sbc.com</u>
CH-00-3-54	6/12/00	K. CannCasciato	P.O. Box 244 Ellensburg, WA 98926
CH-00-3-55	6/12/00	M. Prebilic	<u>verbmagic@earthlink.net</u>
CH-00-3-56	6/12/00	Christina Phillips	<u>Christina.Phillips@MW.Boeing.com</u>
CH-00-3-57	6/12/00	Dr. L. Foster	<u>drfoster@attcanada.ca</u>
CH-00-3-58	6/12/00	M. Lowdermilk	901 Evernia St., West Palm Beach, FL 33401
CH-00-3-59	6/12/00	D. Wilson	1221 Berkely St. Durham, NC 27705
CH-00-3-60	6/12/00	Annie Brock	<u>bkfamacad@surf1.de</u> (Stuttgart, Germany)
CH-00-3-61	6/12/00	Amy Blodgett	<u>blamy10@novagate.net</u> (Springlake, MI)
CH-00-3-62	6/12/00	Edward Baietto	<u>EBAIETTOMD@aol.com</u>
CH-00-3-63	6/12/00	Lisa Zerby	<u>lisaz@tbi.com</u>
CH-00-3-64	6/12/00	Cherie Rivers	<u>crivers@mos.org</u>
CH-00-3-65	6/12/00	D. Rutherford	4053 Bayberry Dr. Chino Hills, CA 91709
CH-00-3-66	6/12/00	Deborah Corino	<u>corino4@southwind.net</u>
CH-00-3-67	6/12/00	Outi Salminen	<u>oms1@cornell.edu</u> (Ithaca, NY)
CH-00-3-68	6/12/00	Nathan Dalleska	2024 Ridgeview Ave Los Angeles, CA 90041
CH-00-3-69	6/12/00	Eric Banford	<u>efb13@cornell.edu</u> (Ithaca, NY)
CH-00-3-70	6/12/00	Chetana Acharya	American Lung Assn. Of Washington 2625 3 rd Ave Seattle, WA 98121

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CH-00-3-71	5/21/00	Linda lancz	<u>LindaLancz@aol.com</u>
CH-00-3-72	6/12/00	Cybal Hall	<u>cyhall@cf1-hollywood.com</u>
CH-00-3-73	6/12/00	Sheen Perkins	2100 King Edward Dr. Reno, NV 89503
CH-00-3-74	6/12/00	Shula Edelkind	P.O. Box 95265 Atlanta, GA 30347
CH-00-3-75	6/12/00	Linda Martin	<u>Akchum@aol.com</u>
CH-00-3-76	6/12/00	MEC	<u>webdesign@growminds.com</u>
CH-00-3-77	6/12/00	Linda Wood	<u>Lindenwood@aol.com</u> (Omaha, NE)
CH-00-3-78	6/12/00	Marysue Griffin	14119 Ramsey Court Chester, VA 23831
CH-00-3-79	6/12/00	Gail Brewster	P.O. Box 784 Bangor, ME 04402
CH-00-3-80	6/12/00	Susan Attas	1401 Carrington Lane Vienna, VA 22182
CH-00-3-81	6/12/00	Connie Pitts	2470 S. Ouray Way Aurora, CO 80013
CH-00-3-82	6/12/00	Stacy Dallas	<u>imdallas2@earthlink.net</u>
CH-00-3-83	6/12/00	Joanna Ammons	6544 N Sacramento Ave #2 Chicago, IL 60645
CH-00-3-84	6/12/00	Robin Moon	<u>BIENSKI@aol.com</u>
CH-00-3-85	6/12/00	Liliana Angel	<u>jaz747@worldnet.att.net</u>
CH-00-3-86	6/12/00	Laura Kane	<u>RJLLKane@aol.com</u>
CH-00-3-87	6/12/00	Susan Grumman	<u>suki_g@juno.com</u>
CH-00-3-88	6/12/00	Christine Lang	<u>lang_christine@bah.com</u>
CH-00-3-89	6/12/00	Shannon Loch	207 Minter St. Uvalde, TX 78801
CH-00-3-90	6/12/00		<u>Imadjohn@aol.com</u>

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CH-00-3-91	6/12/00	V. Copper	875 Franklin Rd Marietta, Ga
CH-00-3-92	6/12/00	M. Wise-Miu	<u>mwisemiu@mindspring.com</u> (Alpharetta, GA)
CH-00-3-93	6/12/00	P. Tesoriero	<u>Pstes@aol.com</u>
CH-00-3-94	6/12/00	Margaret Michling	<u>jpm@greatlakes.net</u>
CH-00-3-95	6/12/00	Helen Evett	<u>Evett5of5@aol.com</u>
CH-00-3-96	6/12/00	D. Gabry	<u>ggabry@sprintmail.com</u>
CH-00-3-97	6/13/00	Alecia Caine	<u>Aleciall@aol.com</u>
CH-00-3-98	6/12/00	John Sobey Sally Sobey	<u>jsobey@ev1.net</u>
CH-00-3-99	6/12/00	N. Gross	<u>ngross@a-znet.com</u>
CH-00-3-100	6/12/00	M.K. Mallory	<u>kmallory@gateway.net</u>
CH-00-3-101	6/12/00	C. Coolbaugh	<u>danick74@juno.com</u>
CH-00-3-102	6/12/00	Brian Pearce	<u>bpearce@t1cnet.com</u> (Texas)
CH-00-3-103	6/12/00	Angela	<u>davisdavidd@alltel.net</u>
CH-00-3-104	6/12/00	George Bovolak	<u>bavolakelect@earthlink.net</u>
CH-00-3-105	6/12/00	E. Strickland Pediatric Nutritionist	<u>Adhdpuzzle@aol.com</u>
CH-00-3-106	6/12/00	Murray Calliandra	<u>callim@pacbell.net</u>
CH-00-3-107	6/13/00	Cathy Flanders IAG Manager	<u>Rkfabf@aol.com</u>
CH-00-3-108	6/13/00	Michelle Ansdell	<u>adventurecity@prodigy.net</u>
CH-00-3-109	6/13/00	Vicky Brett	<u>vicky.brett@khi-ro.co.uk</u>
CH-00-3-110	6/13/00	K. Santangelo	<u>santangelokristen@hotmail.com</u>
CH-00-3-111	6/13/00	Mary Vetter	P.O. Box 254 Wallingford, PA 19086

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CH-00-3-112	6/12/00	Shari Soloman Legislative Analyst	National Multi Housing Council 1850 M St, NW Suite 540 Washington, DC 20036
CH-00-3-113	6/13/00	Tina Neece	TinaNeece@imtt.com
CH-00-3-114	6/12/00	Patricia Erickson	waterratt@pa.free1.net
CH-00-3-115	6/13/00	Linda Menkins	MENKINSL@labs.wyeth.com
CH-00-3-116	6/13/00	Rick Knelsen Grace Knelsen	grknelsen@home.com
CH-00-3-117	6/13/00	Geri Modell	gmodell@lds.com
CH-00-3-118	6/13/00		Potata1@aol.com
CH-00-3-119	6/08/00	Peter Lurie, MPH Deputy Director & Sidney Wolfe, MD Director	Public Citizen's Health Research Group 1600 20 th St., NW Washington, DC 20009
CH-00-3-120	6/06/00	Alan Ducatman MD, MSc, Chair Department of Community Medicine	Robert C. Byrd Health Sciences Center of West Virginia Univ P.O. Box 9190 Morgantown, WV 26506
CH-00-3-121	6/14/00	Jeffifer Shaw	jsha@sms.k12.us
CH-00-3-122	6/14/00	Danelle Hartline	rchdrh@earthlink.net
CH-00-3-123	6/14/00	Laura Palumbo	l_palumbo@att.net
CH-00-3-124	6/14/00	Carolyn Allen	Bunglerye@aol.com
CH-00-3-125	6/14/00	Michael Elliott	Sootguy@aol.com
CH-00-3-126	6/14/00	Ana	lanet@bellsouth.net
CH-00-3-127	6/14/00	Michael Autore	BAUTORE@email.msn.com
CH-00-3-128	6/14/00	Jeanine Louttit	louttit@impop.bellatlantic.net
CH-00-3-129	6/14/00	Judith Schulz	jschulz@ozemail.com.au

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CH-00-3-130	6/14/00	Elle Griswold Coordinator	Citizens for Health of the Inland Empire 11231 Heathrow Dr. Riverside, CA 92503
CH-00-3-131	6/14/00	Carolyn Ross	<u>cross002@san.rr.com</u>
CH-00-3-132	6/7/00	Jerome Nriagu PhD, DSc, Professor and Director	The University of Michigan 109 S Observatory St Ann Arbor, MI 48108
CH-00-3-133	6/17/00	Daphne New Mike New	<u>candlebarn@Lnet1.com</u>
CH-00-3-134	6/29/00	Kristine Westrom	<u>kwestrom@uswest.net</u>

Lead
in
Candles

64
04/11/00

1102 Coventry Dr.
Thousand Oaks
CA. 91360
April 21, 2000

Dear C.P.S.C.,

Apparently Public Citizen HRG petitioned C.P.S.C. to ban all candles with wicks containing lead 25 years ago. But in 1974 the EPA and the candle industry made a voluntary agreement to stop making these candles, so supposedly ~~to~~ no federal ruling was necessary. In February 2000 Public Citizen's HRG bought candles in 12 stores in the Baltimore-Washington area. 30% of those candles contained lead, always in very high quantities such that 336.85 percent by weight of the metallic core was lead. There are millions of candles sold each year that contain lead. So much for the voluntary agreement between the candle industry and the CPSC! We need a federal law banning lead in candles!

I have always been very careful to protect my family from exposure to lead. My 2 year old daughter is going to U.C. Davis. She is renting a house with two other girls. Last time she was home, she just happened to

mention that one of her roommates likes to light lots of candles and leave them burning. I wasn't real happy about that, because I consider that to be a safety hazard because all those candles might inadvertently start a fire. But now that I know the 30% of all candles sold have lead in them, I'm really upset! Lead in candles wicks should have been banned in 1974! To hell with voluntary agreements! I'm going to ask my daughter, Sarah, to get a blood test for lead. If her blood level is high, I'm going to call my P.I. lawyer, Steven Heller (818) 995-4646. Your bad decision could significantly hurt any children Sarah may have.

I'm a substitute teacher, so I know what it's like when children have decreased intelligence, impaired development, learning disabilities, and memory and concentration problems! Not good!

Please write me and tell me what you are planning to do about this problem.

Sincerely,

Marianne Cline
(805) 497-4993

Health Letter

SIDNEY M. WOLFE, M.D., EDITOR

APRIL 2000 ♦ VOL 16, NO 4

Safety Alert! It Is Better to Curse the Darkness Than to Light This Kind of Candle

More than 25 years ago, Public Citizen's Health Research Group (HRG) petitioned the government's Consumer Product Safety Commission (CPSC) to protect children and fetuses from brain damage caused by toxic emissions from candles with wicks containing lead. But in 1974, despite strong evidence of this danger disclosed by research from the same government's Environmental Protection Agency (EPA), the candle industry and CPSC arrived at a voluntary agreement to stop making these candles, thus supposedly making any federal ruling unnecessary. Since that time, however, evidence of the toxic effects of lead at progressively lower levels has mounted. Consequently, lead was banned in gasoline and paint, drastically reducing the average U.S. blood lead levels.

Lead is known to cause prematurity, decreased intelligence, antisocial behavior, impaired development, and learning disabilities at levels that the federal Centers for Disease Control and Prevention (CDC) previously considered acceptable. Higher lead exposure can result in high blood pressure, digestive difficulties, memory and concentration problems, joint pain, pathological changes to the brain and nerves, and even death.

Lead being so toxic, one wonders why it is used in candle wicks. The answer is that lead stiffens the wick so that the flame won't be extin-

gushed in the melted wax. It also makes the flame burn hotter and more slowly, causing the scented material in the wax to vaporize better, thus enhancing the aroma. But lead is not the only substance that will do these things, many alternatives exist, including paper- and cotton-core wicks, and prewaxing of wicks before candles are formed.

In February 2000, to determine whether the voluntary ban had been effective, Public Citizen's Health Research Group conducted a survey of

12 stores in the Baltimore-Washington area. Thirty percent of all candles examined had metallic wicks. Ten percent of these metal wicks (and 3 percent of all candles in the study) contained lead, always in very high quantities such that 33 to 85 percent by weight of the metallic core was lead. In an industry that manufactures about 1 billion candles annually, there are millions of candles sold each year that contain lead.

Our study determined that burn-

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St. John's Wort: A Growing List of Harmful Drug Interactions

Once again, the British government is doing a better job warning doctors and patients in that country about dangers concerning drugs than the Food and Drug Administration (FDA). Reprinted below is a letter sent to FDA Commissioner Dr. Jane Henney by *Health Letter* editor Dr. Sidney Wolfe urging that Americans be similarly warned about new information concerning interactions between the widely-sold St. John's Wort and a long list of commonly used prescription drugs.

British physicians and patients are now being forcefully warned—for many more drugs than American physicians or patients—about potentially serious, clinically important drug interactions be-

tween the unregulated herbal St. John's Wort (*Hypericum perforatum*) and a large number of prescription drugs. For 10 widely-used drugs or classes of drugs, the British government's Committee on the Safety of Medicines is warning doctors and patients to stop the use of St. John's Wort in people using any of these drugs and urging that patients be warned not to start the use of St. John's Wort if they are already using these prescription drugs. For some of these drugs, however, patients are urged to see their pharmacist or doctor before stopping St. John's Wort as the dose of the prescription medicine may need to be altered to prevent adverse effects.

The United Kingdom's Committee on Safety of Medicines warned on February

29, 2000 that St. John's Wort should not be used with the following list of widely used prescription drugs because of the possible serious consequences: carbamazepine (Tegretol), citalopram (Celexa), cyclosporin (Sandimmune, Neoral), digoxin (Lanoxin); fluoxetine (Prozac), fluvoxamine (Luvox), naratriptan (Amerge), oral contraceptives, paroxetine (Paxil), phenobarbital (Luminal), phenytoin (Dilantin), nizatran (Maxalt), sertraline (Zoloft), sumatriptan (Imitrex), theophylline (Theo-Dur and many others), warfarin (Coumadin), and zolmitriptan (Zomig).

We have reprinted, immediately following, the fact sheet for the public for your reference.

continued on page 4

CANDLES, *continued from page 1*

ing these candles for a few hours daily in a typical room would exceed EPA air lead regulations by at least 15 times, but the output of some candles could exceed the limit by 29 times. Even the lowest of these air-lead concentrations would likely raise a child's blood level above CDC safety recommendations. In fact, exposing a child for only forty-five minutes a day in a room where these candles are burned will raise a child's blood-lead level above what the CDC considers safe. Furthermore, children ingest and inhale vaporized lead that settles as house dust on food, floors and other surfaces.

On February 24, 2000, Public Citizen's Health Research Group petitioned the CPSC to ban and recall all domestic and imported candles that have wicks containing lead. At least one other country has already acted along these lines. Last year the Australian Minister of Financial Services and Regulation ordered a ban on all candles with lead-containing wicks because of a preponderance of evidence that they are hazardous. This official, Joe Hockey, stated, "Pub-

lic health experts have confirmed that lead emissions from any source pose an unacceptable public health risk and can result in increased blood-lead levels in unborn babies, babies and young children. Public health experts have confirmed that the candles pose a risk to public health if burned in a confined space."

Although it is apparent that the Australian government protects its citizens better than its American counterpart does, both are decades late. In 1974, Russell Train, then Administrator of EPA, had already warned that "inhabitants of homes in which lead-wicked candles are burned could be exposed to substantial incremental quantities of lead which, if continued on a regular basis, would pose a significant risk to health especially among children with already elevated lead body burdens. In my opinion candles represent an unnecessary incremental source of lead that can readily be controlled."

All this being well documented history, what is the CPSC waiting for? Too many children have been exposed since Public Citizen first urged action.

What You Can Do

Don't buy any candles that have metallic wicks unless they are labeled as not containing lead. Return all such candles to the store of sale. To determine if a candle has a metallic wick, look at the very center of the candle. Metallic wicks will have a thin, shiny center or core. Visualizing this sometimes requires peeling back the wax and cotton that surround the core of the wick. Do not trust industry claims that you can distinguish leaded wicks from non-leaded wicks.

If you or your children have been exposed to candles that contain metallic wicks, tell your doctor and ask him or her for blood tests to determine blood-lead levels.

Demand that your store stop selling candles with metallic wicks unless they are labeled as not containing lead—or tell them you'll take all your business elsewhere.

Write the CPSC urging a ban and recall orders for all candles containing wicks with lead at U.S. Consumer Product Safety Commission, Washington, DC 20207, Phone 1-800-638-2772 or email a message from their web site at <http://www.cpsc.gov/incident.html>



CPSC/OFFICE OF
THE SECRETARY
2000 MAR 16 P 2:30

Russell E. Train
Chairman Emeritus

March 9, 2000

Ann Brown, Chairperson
U.S. Consumer Product Safety Commission
Washington, DC 20207-0001

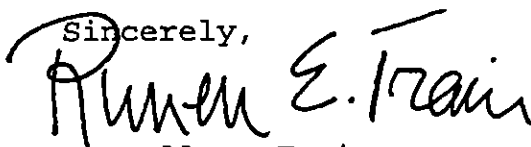
Dear Chairperson Brown:

I am writing in strong support of the petition filed February 24 with the CPSC by Public Citizen to ban immediately and to recall all candles with lead-containing wicks, candles in metal containers that contain lead, and wicks sold for candle-making that contain lead as an imminent hazard to public health.

This letter is not intended to represent views of World Wildlife Fund but views held by me both personally and as a former administrator of the Environmental Protection Agency. On March 17, 1974, in the latter capacity, I wrote Richard Simpson, then chairman of CPSC, urging the Commission to do all in its power to prevent exposure to lead-wicked candles. I cited 1973 and later studies by EPA scientists that substantiated the health risks involved, particularly to children.

It is my understanding that the industry involved and the CPSC entered into a voluntary agreement in 1974 to stop the making of candles with wicks containing lead. It is also my understanding that, despite the voluntary agreement, a significant number of candles containing such wicks continue to be marketed in the United States. Thus, the 1974 voluntary agreement has not proved effective. I strongly urge an immediate ban and recall. The twenty-five years since 1974 would seem to be ample time for the industry to take effective action.

Sincerely,



Russell E. Train

World Wildlife Fund

1250 Twenty-Fourth St, NW Washington, DC 20037-1132 USA
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HARVARD SCHOOL OF PUBLIC HEALTH

Department of Environmental Health
Occupational Health Program

Howard Hu, M.D., M.P.H., Sc.D.
Associate Professor of Occupational Medicine
Director, Residency in Occupational and Environmental Medicine

CPSC/DFC OF THE SECRETARY
PROF. H. HU
REGISTRATION

2000 MAR 22 A 11:02

3

March 15, 2000

Ann Brown
Chairperson
US Consumer Product Safety Commission
Washington, DC 20207-0001

Dear Chairperson Brown:

I am writing in strong support of Public Citizen's petition to you dated February 24, 2000 to immediately ban and recall all candles with lead containing wicks, candles in metal containers that contain lead, and wicks sold for candle making that contain lead

I find the discovery by Public Citizen that a significant percentage of these candles admit lead fume extremely troubling

My particular speciality is investigations into the long-term toxicity of lead in adults. In a series of recent studies that we have performed over the last five years, we have found that adults who have had only modest community exposures to lead carry a significantly elevated risk of developing hypertension (both men¹ and women²), EKG, electrocardiographic abnormalities³, and decrements of cognitive function⁴. Our discovery was made possible by the development and application of new technique for measuring how much lead has been stored in the skeleton, which is the long-term storage organ of lead in the body^{5,6}.

Perhaps even more troubling is our discovery that lead that has been stored in the skeletons of women of reproductive age comprises a significant risk factor for fetal toxicity manifesting as lower birth weight, shorter head circumference, and shorter birth length⁷.

In other words, in addition to those studies that were cited by Public Citizen in their petition to you, our research group has been generating evidence that low-level lead exposure of the kind that is emitted from these candles can accumulate in the body and be responsible for chronic toxicity outcomes later in life.

I hope you will act expeditiously on Public Citizen's findings and I applaud the consumer product safety commission's usual aggressive efforts to protect consumers from unnecessary risk such as the one posed by lead contaminated candles.

Please let me know if I can be of any assistance in your deliberations

Sincerely,

A handwritten signature in black ink, appearing to be 'H. Hu', written in a cursive style.

Howard Hu, M.D., M.P.H., Sc.D
Associate Professor of Occupational Health
Direct telephone: 617-525-2736
Direct fax: 617-525-0362
E-mail: howard.hu@channing.harvard.edu

cc. Sidney Wolfe, M.D.
Public Citizen

REFERENCES

1. Hu H, Aro A, Payton M, Korrick S, Sparrow D, Weiss ST, Rotnitzky A. The relationship of blood and bone lead to hypertension among middle-aged to elderly men. *JAMA* 1996;275:1171-1176
2. Korrick SA, Hunter DJ, Rotnitzky A, Hu H, Speizer FE. Lead and hypertension in a sample of middle-aged women. *Am J Public Health* 1999;89:330-335
3. Cheng Y, Schwartz J, Vokonas P, Weiss ST, Aro A, Hu H. Electrocardiographic conduction disturbances in association with low level lead exposure. the Normative Aging Study. *Am J Cardiol* 1998;82:594-599.
4. Payton M, Riggs KM, Spiro A, Weiss ST, Hu H. Low-level lead exposure, aging, and cognitive function: the Normative Aging Study. *J Neurotox Teratol* 1998;20:19-27
5. Hu H, Rabinowitz M, Smith D. Bone lead as a biological marker in epidemiologic studies of chronic toxicity: Conceptual paradigms. *Environ Health Persp* 1998;106:1-8.
6. Hu H. Bone lead as a new biological marker of lead dose: recent findings and implications for public health. *Environ Health Perspect* 1998;106(Suppl 4):961-967.
7. González-Cossío T, Peterson KE, Sanín L, Fishbein SE, Palazuelos E, Aro A, Hernández-Avila M, Hu H. Decrease in birth weight in relation to maternal bone lead burden. *Pediatrics* 1997;100:856-862

May 24, 2000

The Honorable Ann Brown
Chairman
U S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, Maryland 20814

Dear Chairman Brown:

RE: Petition No. HP 00-3

On behalf of the National Multi Housing Council (NMHC) and the National Apartment Association (NAA), I am writing to express our concern with the Consumer Product Safety Commission's (CPSC) handling of the petition we filed regarding the use of lead wicks in candles. We believe that CPSC should act decisively in the interests of the health and safety of the nation's million children under the age of 6 to protect them from a totally avoidable source of lead exposure. CPSC should not delegate responsibility for addressing this critically important issue to the American Society for Testing and Materials (ASTM).

In 1974, the Administrator of the U S. Environmental Protection Agency told CPSC that Agency research had determined "lead wicked candles represented a significant incremental and unnecessary source of lead that would likely aggravate the childhood lead problem. . and could equal or exceed the exposure to airborne lead associated with the busiest freeways in America."¹ At that time, CPSC permitted the candle manufacturers to deal with this important environmental health issue through the development of an industry position paper.

According to the report of the President's Task Force on Environmental Health Risks and Safety to Children entitled **Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards**, nearly one million children living in the United States have elevated blood lead levels (hereinafter cited as the "Federal Strategy", attached). The report cites numerous studies in which lead has been linked to impaired cognitive function, behavior difficulties, reduced intelligence, impaired hearing and reduced stature ²

The time is past for voluntary compliance with non-binding *ad hoc* standards. There is sufficient science to support the toxic level of lead emissions associated with this product as well as the deleterious effect of lead on human health. An economic assessment of the costs associated with lead dust hazards in the residential environment is contained in Table 25 of the appendix to the Federal Strategy (attached). Federal regulators have justified billions of dollars in testing and remediation costs for the real estate industry based on the counter balancing costs to society in general, associated with neurologically impaired children, the cost of their education, and

¹ Letter of Russell Train, EPA Administrator, to Richard Simpson, Chairman of the CPSC. 1974

² Federal Strategy at p 2.

diminished lifetime learning abilities We believe that this economic analysis is sufficient to justify an immediate recall of candles containing lead wicks and a ban on the future sale of such products.

The National Candle Association acknowledges that there has been an industry-wide voluntary ban of lead in wicks since 1974. Unfortunately, some of the largest U.S. manufacturers of this product have failed to adhere to this voluntary ban. According to a recently published analysis of candles manufactured in the U.S., China and Mexico, candles produced in the U.S. had highest level of lead emissions ranging up to 66 $\mu\text{g}/\text{hour}$.³ This volatilized lead is subsequently deposited throughout the residential environment in dust where children may be exposed to deleterious levels through normal hand to mouth activities.

Having participated as members of prior ASTM task groups, we believe that the lengthy ASTM voluntary standard setting process is not the proper venue to use to ensure the immediate protection of human health. In addition, we have serious reservations about the diversity of perspectives represented on the work group, since it appears to be dominated by representatives of the candle manufacturing industry. Independent scientists who have conducted research on lead emissions from candles and the results of which have been published in peer-reviewed journals are not represented on the panel. Moreover, housing providers were not asked by the organizers to participate in the task group despite having raised serious concerns over our ability to assure a lead safe environment for our residents who may use these products.⁴

We petitioned the CPSC for a ban on the sale of candles containing lead wicks and respectfully believe that it is CPSC who should take immediate action to protect human health by recalling candles with lead containing wicks and ban the future sale of these products. The health risk posed by the use of lead in a non-essential product such as long-burning candles does not justify the continued sale of these types of products for the next two years while ASTM mulls the obvious.

Sincerely,



Eileen Lee Ph.D.
Vice President of Environment

Attachments

cc: Mrs. Tipper Gore

³ J.O.Nriagu and M.J. Kim. Emissions of lead and zinc from candles with metal-core wicks *The Science of the Total Environment* 250 (2000) 37-41.

⁴ We learned of the May 5 meeting of the ASTM group from Public Citizen a co-petitioner on this matter. Public Citizen was informed of the meeting by the Alliance to End Childhood Lead Poisoning.



OS 2000 205

U S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

Todd A. Stevenson
Deputy Secretary and
Freedom of Information Officer
Office of the Secretary

Tel 301-504-0785X1239
Fax 301-504-0127
Email t Stevenson@cpsc.gov

June 8, 2000

Eileen Lee Ph.D
Vice President of Environment
National Multi Housing Counsel and
National Apartment Association
1850 M Street, NW, ♦ Suite 540
Washington, DC 20036

Dear Dr. Lee:

Thank you for your letter dated May 24, 2000 to Chairman Ann Brown of the U.S. Consumer Product Safety Commission (Commission) regarding the Petition HP 00-3 on Candle Wicks Containing Lead. As you know, the Commission is presently reviewing the petition regarding this important topic and collecting information and comments from the public. We will make your comments part of the official records from the public regarding the issues. The Commissioners and the project staffs will consider your comments as the regulatory decisions are taken.

Sincerely,

A handwritten signature in black ink, appearing to be "Todd A. Stevenson", written over a horizontal line.

Todd A. Stevenson

Stevenson, Todd A.

*Lead in
Candle*

5

From: Ruby Two [ruby2_57@yahoo.com]
Sent: Saturday, May 27, 2000 11:08 PM
To: cpsc-os@cpsc.gov
Subject: ``Petition HP 00-3--Candle Wicks

Dear Committee; I am writing to support the ban:

``Petition HP 00-3--Candle Wicks
Containing Lead.``

I am writing because our family has had first hand effects of injury from lead in the air. All of us, both adults and children suffered physical and mental injury. We have 60 to 90% loss of nerves that function to our peripheral limbs. The youngest, age 7 at the date of injury has 3 tutors, speech, math, and spelling. She has been able to learn to read but cannot write, spell or use a dictionary. She has not, now even going into 5th grade been able to add, subtract, multiply or divide. How is she going to work. It is not only a personal injury, it is a human disaster, suffering beyond words. Who is going to support this child when she grows up. Is the US gov going pay all her bills and medical problems. No, her suffering is a social disaster. That disaster is going to continue if we put our heads in the sand and ignore the fact manufactures don't care if they harm a human all they care about is the bottom line. The dollar. But it is time for the US to see the bottom line. When all their children are injured and cannot think or make money or become delinquent because they have no ability to make a living it is the society who ends up paying. Vote for the minds of all. Vote for banning and find out the other products which contain lead and other heavy metals. Such as perfume. We have proof. You should too.

Do You Yahoo!?
Kick off your party with Yahoo! Invites.
<http://invites.yahoo.com/>

~~Stevenson, Todd A.~~

6

From: Ron Holmes [chinadoc@jps net]
Sent: Thursday, June 01, 2000 9 18 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP00-3--Candle Wicks Containing Lead

Please remove lead from candle wicks. It is a severe health hazard
Sincerely,
Ronald Holmes LAc.
Ancient Roots Acupuncture and Herbology

~~Stevenson, Tedd A.~~

7

From: DonPaladin@aol.com
Sent: Thursday, June 01, 2000 9:04 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-3--Candle Wicks Containing Lead

Please ban the use of lead in candles. Lead in candle wicks produces hazardous combustion materials when the candles are used, creating a lead poisoning hazard for occupants, particularly children.

You should have enough epidemiology research on the toxicity of lead to make this no-brainer decision. Please use common sense and protect the safety of the public.

Thank you.

Don Richard Paladin
Bellingham, WA USA

"To make no mistake is not in the power of man, but from their errors and mistakes the wise and good learn wisdom for the future." Plutarch (46 - 120 A.D.)

~~Stevenson, Tom A.~~

8

From: Eagle Nest [airc0mbat0@hotmail.com]-
Sent: Thursday, June 01, 2000 7:55 PM
To: DSMA@CDRH.FDA.GOV, BJL@CDRH.FDA.GOV, JXA@CDRH.FDA.GOV,
NML@CDRH.FDA.GOV
Cc: cpsc-os@cpsc.gov
Subject: NOTHING CHANGED, THE IDIOTS AND MORONS STILL REIGN IN FDA

WHY WE ALLOW IDIOTS OF FDA TO ALLOW INDUSTRY INJURE US?

I'm a Mom in Texas that has been working for the past 3 years to have lead banned in the use of candle products. You see my home was contaminated [40x the HUD abatement threshold] with lead from candles I purchased from the Gap & Banana Republic. My son has elevated levels of lead in his system the effects of which are just beginning to manifest themselves.

As you may have heard by now about Nader's Public Citizen & Health Research Group's petition to issue a legally mandatory ban & recall on the use of lead in candle wicks. I'm wondering if I can enlist your assistance in getting the message out that we need to get comments in to the CPSC re: this petition ASAP - deadline is June 12th. I know you keep in contact with many people that would support this & you are effective at mobilizing people - it would be so appreciated if you could circulate this with some of the groups you "hang out" with. We need all the support we can bring together or they will sweep this again right under the rug with an unenforceable, voluntary ban, clearly this is not in the best interests of consumers & their safety or welfare.

This was an issue back in 1973 & 1974 & should have been taken care of then but in spite of the EPA Administrator at the time urging a mandatory ban...a voluntary ban was approved and then not complied with. The EPA study that Mr. Train referenced was performed in 1974 & determined that -

"Burning only two candles three hours each day on a regular basis in the home could increase exposure to airborne lead by a factor of 5 or more. This exposure to lead from candles could equal or exceed the exposure to airborne lead associated with the busiest freeways in America." [keep in mind this was

*Candles
6/16/01
6/17/00
2*

WHY WE ALLOW IDIOTS OF FDA TO ALLOW INDUSTRY INJURE US?

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"Burning only two candles three hours each day on a regular basis in the home could increase exposure to airborne lead by a factor of 5 or more. This exposure to lead from candles could equal or exceed the exposure to airborne lead associated with the busiest freeways in America " [keep in mind this was a time when leaded gasoline was still fairly commonplace]. "Inhabitants of homes in which lead wick candles are burned could be exposed to substantial incremental quantities of lead which, if continued on a regular basis would pose a significantly high risk to health especially among children." Mr. Train goes on to say: "In my opinion candles represent an unnecessary incremental source of lead that can readily be controlled. It is my strong recommendation that the Consumer Product Safety Commission do all in it's power to prevent exposure to the substantial and unnecessary source of lead in candles."

To read referenced letter & other related documents go to: http://www.fiscorp.net/iaq/docs/

If you would like to read more on the current pending petitions, these 2 links can fill you in:

Petition to ban lead candles

Millions of Dangerous Candles Sold Throughout U.S.; Lead Wicks Pose Major Health & Safety Hazard, Especially to Children

In any event, the CPSC is taking comments from the public regarding this

proposal until June 12th. Unbelievable that in the year 2000 we even need a petition & comment period to ban this insidious poison consumers may be unwittingly releasing into their homes & attempt to fix an erroneous policy on lead in candles from 26 years ago. But the fact remains that's where we stand now. I'm really hoping that I might be able to enlist the your assistance in submitting comments, possibly even encourage like minded individuals to submit comments as well.

NOTE: You are welcome to use any of the text of this message in order to save time.

Here is some of the information about the comment period & where to send the comments -

Petition HP 00-3 Requesting a Ban of Candle Wicks Containing Lead and of Candles Containing Such Wicks - Comments accepted until 6/12/00
<http://www.cpsc.gov/businfo/frnotices/fr00/wicks.html>

ADDRESSES: Comments on the petition should be sent to:
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207
telephone (301) 504-0800

OR delivered to:
Office of the Secretary, Consumer Product Safety Commission
room 502, 4330 East-West Highway
Bethesda, Maryland 20814.

Comments may also be filed by
Fax (301) 504-0127 or
email to: cpsc-os@cpsc.gov

Comments should be captioned ``Petition HP 00-3--Candle Wicks Containing Lead.' ' Copies of the petition are available by writing or calling the Office of the Secretary.

If you feel it appropriate, please inform your colleagues & other supporters of Children's Environmental Health of this issue & comment period. This whole issue was raised & attracted the attention of the media & public health officials by a Mom, how fitting it would be if a flood of comments from Mothers was responsible for instituting an enforceable ban & possibly a Federal Law...correcting the mistake of almost 3 decades of looking the other way. After all it is women for the most part that make this product [especially crafters], purchase this product, we are the ones that burn them, consequently we & our children face the most significant exposures. We are the most affected by these products & therefore we need to have a voice & be given the consideration to be heard. For instance did you know that 7 out of 10 homes burn candles on what would be considered a regular basis, according to a Kline & Co. study.... Or that 96% of women have purchased scented

candles in the past 12 months? If this isn't a women's & childrens issue I don't know what is.

According to Dr. Lurie, from Nader's Health Research Group, who attended the May 5th CPSC meetings these comments aren't just busy work this time, in fact they could be a crucial deciding factor in the final decision & be demonstrative of public opinion & support to a mandatory ban against the use of lead in candles.

The media interest alone should be a clear indication that consumers are interested in avoiding unnecessary exposures to toxic substances - especially where their children are concerned.

If that is at all accurate...how sad! Who does the CPSC protect & what do they stand for anyway? I get the distinct impression their more preferred method for dealing with legitimate consumer concerns is for the consumer to file the paperwork, then receive a form letter from the CPSC offices thanking them for their report..."Now go away, we're busy & we'll deal with this when we are damn good & ready, & that might mean 25 or so years." That's really too bad, don't you think - that a Mom that actively takes issue with a public health concern & draws attention for the need to address it becomes the target of loathing from the very organization that should have protected us in the first place.

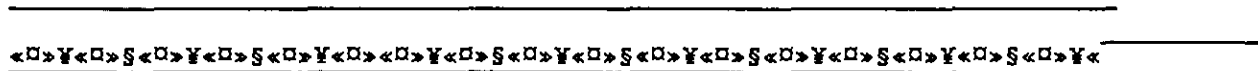
At any rate, the forwarded message that follows will catch you up on just what action the CPSC & the National Candle Association will go forward with UNLESS something or someone persuades them to do otherwise

Let me know if you need any additional information or have any questions at all. I do have copies of most of the studies & papers that substantiate the risk from burning candles with lead core wicks - let me know if you'd like to view them.

Thanks in advance for any assistance you can give to foster comments from the public.

Personal E-Mail: RKFABF@aol.com
IAQ List - Home
http://www.onelist.com/community/iaq
IAQ List - Links
http://www.onelist.com/links/iaq

Candles and Indoor Air Quality
http://www.fiscorp.net/iaq/
Homeowners Soot Damage Discussion
http://disc.server.com/Indices/41692.html



Forwarded Message:

Subj: Requested Information [Message 1 of 2]
Date: 5/11/00 3:47 18 PM Central Daylight Time

Hello Peter -

As I understand it the potential for a ban on lead in candle wicks will be watered down to yet another voluntary action & 1% lead in wicks would still be permissible. I am of the opinion that a voluntary ban failed miserably over the last 25 or 26 years & I have no evidence to indicate that a new one would be any more binding or effective, especially in light of the misinformation that the NCA continues to banter about. Allowing ANY amount of lead in a consumer product when clearly there are alternatives is not in the best interests of consumers or public health.

THE FOLLOWING TEXT IS A VERBATIM EXCERPT FROM THE CPSC'S OWN Codification of
Guidance Policy on Lead in Consumer Products

"...(2) To reduce the risk of hazardous exposure to lead, the Commission requests manufacturers to eliminate the use of lead that may be accessible to children from products used in or around households, schools, or in recreation. The Commission also recommends that, before purchasing products for resale, importers, distributors, and retailers obtain assurances from manufacturers that those products do not contain lead that may be accessible to children.

(b) Hazard. Young children are most commonly exposed to lead in consumer products from the direct mouthing of objects, or from handling such objects and subsequent hand-to-mouth activity. The specific type and frequency of behavior that a child exposed to a product will exhibit depends on the age of the child and the characteristics and pattern of use of the product. The adverse health effects of lead poisoning in children are well-documented and may have long-lasting or permanent consequences. These effects include neurological damage, delayed mental and physical development, attention and learning deficiencies, and hearing problems. Because lead accumulates in the body, even exposures to small amounts of lead can contribute to the overall level of lead in the blood and to the subsequent risk of adverse health effects. Therefore, any unnecessary exposure of children to lead should be avoided."

I feel rather strongly that absolutely no lead should be permitted, that would in effect do away with metal core wicks because all metal wicks have tested positive for measurable amounts of lead. I say good riddance, soldering fumes from burning any metal have no place in the home environment & like I said there are equally or even superior performing alternatives that are available in the industry NOW [cotton & paper core wicks]. Are they prepared to provide consumers with a total number of candles that can be burned at one time, over a week, over a year or over a lifetime in order for them to "pace" their lead exposures to maintain a permissible level of uptake? And what about the residual lead that will continue to accumulate on

surfaces in the home, especially carpets? Should candles be sold with a lead monitoring kit or devise, or consumers wear lead measuring monitors on their lapels much as x-ray technicians & dental workers do? However, if they insist on arguing the necessity of metal core wicks to the industry I'm going to propose that the CPSC mandate that these products be labeled "Contains Lead

" in a conspicuous manner so as to afford the consumer the opportunity to make an informed choice at the time of purchase &/or use. If this label would influence a buying decision then it's imperative that it be labeled, consumers shouldn't be treated like children & be placed in the precarious position of having to trust a manufacturer or seller [that stands to profit from the sale of a product] to judge for them what is safe & what isn't and what is an acceptable level of poison. I can tell you without any hesitation

if the candles I had purchased & used had so much as hinted at any lead content not only would I not have bought them but they couldn't have given them to me. Furthermore, suppose a manufacturer steps over the .1% limit & the consumer later discovers this, what recourse is there for the consumer who has been deceived into thinking the product was safe? [it should be noted

that this would be at additional expense for the consumer to determine, whereas it is pretty straightforward for a consumer on their own to identify if a wick contains metal or not]. Are there any consequences from the CPSC or

NCA? It's not unlike a parent that tells a child not to do something that is unsafe, or "else"...without a clue as to what the "or else" will be, it's a tiger without teeth. From my own experience I can assure you that litigation is not an appealing remedy, more like a daunting effort from finding an attorney who can effectively argue the case, to funding costly testing & analysis to the invasion of one's personal & private life which will be delved into through interrogatories & depositions. And all this with no assurance that the candle manufacturer &/or seller will be held accountable to the consumer. It's an expensive, time consuming and often invasive ordeal for the consumer that could have been avoided all together with the placement of an obvious label to disclose lead content of the product.

This entire controversy could have an immediate, cost effective and easily enforceable remedy - eliminate metal core wicks all together...there's no expensive testing, no wiggle room, no guessing...in my opinion it's the only responsible and enforceable thing to do, period.

We all pay the price for lead exposures since research has shown what only a few years ago used to be considered slight or permissible exposures can rob children of their learning potential & the hope of what "might have been", increased health care costs from treating the myriad of health complications from lead exposures and as a society we pay the price in drop out rates, increased crime, aggressive behavior and domestic violence...all of which studies have shown are influenced by lead & other heavy metal uptake.

* I will probably be sending something along these lines to the CPSC for my "on the record" comments, what do you think...should I include any of the lab or analysis reports with it? By the way, how did the material I faxed to you

come out? I hope you were able to make some sense of it because I had to "feed" documents out of order once I discovered some were sticking together on their way thru the fax the 1st go round. Do you want the entire deposition of the Gap's representatives...the depositions reveal that they were aware of the level of lead content before ever selling the candles, the approx. volume of candles containing lead sold over a 3 year period broken down by year, month, store & sku #. The deposition of the manufacturer's representative indicates that these nearly identical private labeled candles were also sold to the Limited [another national chain of popular women's clothing stores] but I don't know over how long a period.

Now the information you had requested:

Like I stated over the phone, I am not certain whether or not Mike examined other metals in wicks...you will need to contact him directly to get that clarified.

1. Mike Van Alphen

Lead Sense

Mike van Alphen

fax: +61 8 82417055

phone: +61 882417033

P0 Box 3421

Rundle Mall

South Australia 5000

AUSTRALIA

E- mail: mva@camtech net.au

Choice - Candle danger

<http://www.choice.com.au/YourRightsView.asp?CatID=6&SubCatID=62&ArticleID=760>

Candle danger - Lead Wicks & How to Spot Them

<http://www.choice.com.au/SBLRights.asp?SBLID=750&ArticleID=760>

• Mike's work, I believe was a collaborative effort with The Lead Group Elizabeth O'Brien, National Coordinator for The LEAD Group Inc

The LEAD Group Inc

PO Box 161

Summer Hill, NSW 2130, Australia.

Ph: (02) 9716 0014

Fax: (02) 9716 9005

Email: lead@lead.org.au (The LEAD Group)

or info@lead.org.au

Web: http://www.lead.org.au/

2. Australian Statute [see attached document] - please note that this was faxed to me from Australia but it was difficult to read & I needed a more legible copy, so I processed through an OCR [Optical Character Reader] in an attempt to enhance the quality of the text. The law itself in all there & in tact but you will notice some peculiar characters at the top of all 4 pages & then at the text breaks. Just ignore these, it's apparently a font on their cover sheet & headers that the OCR doesn't recognize.

3. CPSC's Codification of Guidance Policy on Lead in Consumer Products - as referenced earlier in this message. This was ratified 12/22/98

Peter here are a few other documents from the Federal Register that may have some relevance...I suppose what really sticks out to me is the concentrated efforts they made to pursue the anti-dumping & there was no effort extended to monitoring compliance of the Voluntary Ban. It's ironic if they had, they might very well have accomplished more towards protecting their membership against the glut of imports than the anti-dumping efforts.

- Anti-Dumping Petroleum Wax Candles from China

- Investigation of Anti-Dumping: Petroleum Wax Candles from China

- Investigation of Anti-Dumping: Petroleum Wax Candle from China [1/4/99]

- Investigation of Anti-Dumping: Petroleum Wax Candle from China [4/19/99]

- Review of Anti-Dumping: Petroleum Wax Candles from China [5/14/99]

- Final Results. Anti-Dumping: Petroleum Wax Candles from China

Misc. documents pertaining to "CANDLES" from the Federal Register:

- 2000 CFR Title 14, Volume 1

- Code of Federal Regulations § 501.7 Candles.

- Code of Federal Regulations § 501.7

Candles. [1/1/2000]

- THE FAIR PACKAGING AND LABELING ACT--Table of Contents

- 2000 CFR Title 14, Volume 1

- 16

CFR Ch. I (1-1-00 Edition)

- Lancaster Settlement

And I assume you were aware of this letter from the EPA recommending the ban in 1974...

- Letter to Richard Simpson Chairman CPSC

Lastly I wanted to make you aware of the availability of the following extensive market research report. I have included the Table of Contents to the report to give you an idea of the type of data it contains. It's possibly on the edge of TMI (too much information) I suppose it could possibly be of benefit in a situation where litigation is involved. Title:

The Candle Report: The Market, The Industry, The Trends

Publisher Unity Marketing Publication Information Frequency: One Time ; Price: 1500 ; Pages: 125+ ; Date: January, 1999 Abstract Candles and

candle accessories topped \$2.1 billion in retail sales in 1998. This new report from Unity Marketing examines in detail the candle market and is based

upon surveys among candle manufacturers, retailers and consumers. It details industry sales by segment, leading categories, distribution channels, growth trends and projections. The report contains marketing profiles of over 30 leading candle marketers including Blyth, Bridgewater Candle Company, Candle-Lit, Illuminations, Village Candle, and many others. It also examines in-depth the specialty retail market for candles, and includes insights into the consumer market, including candle buying behavior and consumer demographics. Report ID Number UM21 Table of Contents

http://ww

w.marketresearch.com/tocs/UM21.htm

Personal E-Mail: RK FABF@aol.com

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IAQ List - Links

<http://www.onelist.com/links/iaq>

[Candles and Indoor Air Quality](http://www.fiscorp.net/iaq/)

<http://www.fiscorp.net/iaq/>

[Homeowners Soot Damage Discussion](http://disc.server.com/Indices/41692.html)

[http //disc.server.com/Indices/41692.html](http://disc.server.com/Indices/41692.html)

Get Your Private, Free E-mail from MSN Hotmail at <http://www.hotmail.com>


Stevenson, Todd A.

Candles

9

From: jd jackson [shammahs bean field@htcomp net]
Sent: Monday, June 05, 2000 9 14 AM
To: cpsc-os@cpsc gov
Subject: Lead in Candle Wicks

Doesn't it seem a bit strange that we outlaw lead in paint and other products that created costly refitting and then you allow people to burn candles wicked with lead in them in their homes?

This is a direct exposure to small children and people who could already be marginally ill. Candles are just not a necessity of life. At least outlaw the stuff in such frivolous applications.

J. D. Jackson

Stevenson, Todd A.

Candle lead 10

From: Alison Stewart [torquill@foogod.com]
Sent: Monday, June 05, 2000 8:00 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-3--Candle Wicks Containing Lead

I support Petition HP 00-3--Candle Wicks Containing Lead.

Lead is a health hazard that has been known well for decades. Great pains have been taken to remove lead from gasoline, paint, pewter, and hundreds of other consumer products. Lead poisoning is still a large concern, especially in children, and its toxicity is legendary.

To burn lead is to put it into the air, where it is inhaled and ingested by other means (soot settling on objects, for example). This is doubly a concern inside homes, where the smoke does not dissipate, and where people and children are exposed to its effects not only while the candle burns, but after it goes out.

There is no reason to keep the lead in candle wicks -- substitute materials are available. Get rid of this source of heavy-metal poisoning in our homes; it's another step in making people in this nation healthier.

Thank you.

Alison Stewart

-----*-----
Alison Stewart (aka Luna Torquill)
<http://www.strappe.com/arcturus/>

"I may regret what I have lost, but
I will not regret what I have become."



Candle
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ALLIANCE TO END CHILDHOOD LEAD POISONING

Board of Directors

June 6, 2000

Bailus Walker Jr., Ph D
Chair

Secretary

Consumer Product Safety Commission
Washington, DC 20207-0001

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Stephanie Pollack, Esq

Jorge Luis Varela, Esq

Ellen Widess, Esq

Re Petition HP 00-3--Candle Wicks Containing Lead

To Whom It May Concern

The Alliance To End Childhood Lead Poisoning submits these comments in support of the above-captioned petition that asks the CPSC to take action against candles with lead-containing wicks. The Alliance is a 10-year-old national non-profit organization committed to protecting all children from lead poisoning through education, advocacy and policy change.

We strongly urge the CPSC to take long-overdue action to ban candle wicks that contain more than trace amounts of lead. We understand that there is a small amount of lead in "special high grade" zinc wire that could be used in candles with metal wicks. This zinc wire contains approximately 0.03% lead, and we believe that an allowable limit of approximately .005% (which would provide an adequate margin for any variation in lead content among different batches of wire) would be an appropriate basis for a CPSC rule. The amount of lead released by burning such wicks is quite small, we believe. While complete elimination of lead from candle wicks could certainly be justified, such a ban might prove to be counterproductive in practice in that it would preclude the use of special high grade zinc wire wicks and might delay promulgation of the final rule as well as undercut compliance. What is most critical is that CPSC expedite action to promulgate a regulation on lead in candle wicks that is binding, enforceable, and enforced.

The Alliance is aware of a candle industry-led initiative to quickly create an ASTM standard under which candle wicks could have lead content of up to 1%. Even if enacted, such an ASTM standard should provide no excuse for inaction by CPSC. Such an ASTM standard would allow lead levels twenty times greater than the standard we propose, even though the lower allowable lead content is readily achievable with a slightly higher grade zinc wire. More importantly, such a standard would not be enforceable. Experience has made painfully clear that voluntary agreements with candle and wick makers have not been effective. The 1974 voluntary agreement failed because not all candle manufacturers were parties to the agreement and because at least one company that was a party to it - the world's largest wick maker - secretly violated the agreement for about 20 years. The Alliance rejects reliance on another voluntary



standard. Furthermore, CPSC must aggressively enforce the regulatory ban once it is established in regulation

Lead exposure causes serious harm to people, particularly children. It reduces IQ and attention span, causes hyperactivity, impaired growth, reading and learning disabilities, hearing loss, and a host of behavior problems. Recent research has found neurological and behavioral harm at lower lead exposure levels than previously known. Recent research has also linked lead exposure with Alzheimer's Disease. CPSC has indicated that it is especially interested in cost issues. The social costs of lead poisoning (health care, lead hazard control, special education costs, criminal justice costs, reduced income and reduced tax contribution for adults who were lead-poisoned as children) far outweigh the minimal costs of using high grade zinc instead of other metal wires in candle wicks. Candle and wick makers have indicated that the cost of the wick material is a small portion of the cost of manufacturing candles

Please take responsible action on this matter to protect the health of children in the US

Sincerely,



Don Ryan
Executive Director

Stevenson, Todd A

*Candle Wicks
12*

From: Nancy Anderson [nla@mint.net]
Sent: Tuesday, June 06, 2000 8:20 AM
To: cpsc-os@cpsc.gov
Subject: HP 00-3 - Candle Wicks Containing Lead

I hope the Consumer Products Safety Commission will act favorably on the above petition outlawing lead in candle wicks.

Thank you.

Nancy Anderson
Rockland, Maine

Stevenson, Todd A.

Candle lead

13

From: karen.l.bowen@ac.com
Sent: Tuesday, June 06, 2000 6:23 AM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-3--Candle Wicks Containing Lead

Please note my firm support for a ban on the sale of candles that contain lead and the sale of wicks for candle making that contain lead. As the Mother of a three year old child expecting a second child this summer, I was appalled to learn that lead from candles is a current source of toxins to which I and my children may be exposed. I had no idea that lead bearing candles or wicks are currently legal, and I certainly believe that they should not be legal. Thank you for your consideration of this important public health matter

Sincerely,
Karen L. Bowen

Candles 14



ENGINEERING PLUS, INC.

JOHN W. ROBERTS, M.S., P.E.

Environmental Toxics, Healthy Homes, Indoor Air

6-6-2000

Office of Secretary
Consumer Products Safety Commission
Washington, D.C 20207

Dear Sir or Madame.

Please ban the production and sale of candles with lead in the wicks. The data suggests that these candles can add to the lead burden of children through inhalation and ingestion of lead contaminated dust. Candles are in widespread use and need to be safe. There are safer ways to produce candles than putting lead in the wicks.

Sincerely,

John Roberts
John Roberts

FAX TO CPSC FAX NO. _____ Date 6-6-00

Lead Candles PHONE _____

FROM JOHN W. ROBERTS
ENGINEERING PLUS, INC.
818 207th Ave. NE
Redmond, WA 98053

Phone and FAX NO. 425-868-8470
Back-up phone NO. 425-868-9439
E-mail engrplus@worldnet.att.net

Number of pages excluding cover page 1

MESSAGE Letter attaché

Candle

~~Stevenson, Todd A.~~

15

From: Rabin, Rick [Rick.Rabin@doh.eol.state.ma.us]
Sent: Tuesday, June 06, 2000 1:27 PM
To: 'cpsc-os@cpsc.gov'
Subject: Petition HP00-3-Candle Wicks Containing Lead

Petition HP00-3-Candle Wicks Containing Lead

1. The CPSC should ban candle wicks that contain any detectable amount of lead.
2. The CPSC should actually issue a regulation banning such wicks and candles.
3. A voluntary agreement with candle and wick makers was tried in the past and did not work. Under no circumstances would another voluntary standard be acceptable.
4. CPSC should aggressively enforce the ban.

Sincerely,

Richard Rabin
Task Force on Lead Poisoning
8 Sawin St.
Arlington, MA 02474

~~Stevenson, Todd A.~~

Candle
16

From: Betty Bridges [bcb56@ix.netcom.com]
Sent: Tuesday, June 06, 2000 9:45 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-3--Candle Wicks

Petition HP 00-3--Candle Wicks Containing Lead

I am writing to urge that no lead be allowed in candles wicks. There is no dispute over the devastating health effects lead can have, especially on children. Allowing any lead in wicks is not in the best interest of public safety. The impact of all the candles burned must be considered and not simply one candle. Lead is persistent in the environment. There is no way of controlling the length of time or the number of candles burned in consumers homes.

There is no warning on candles indicating they should only be burned for short amounts of time or in limited quantity. Indeed, candle advertising often shows numerous candles burning throughout the house and mothers holding infants in those same advertisements. Such advertisements encourage burning many candles and implicate they are safe even around infants. To allow lead, a known toxic to children to be in the products at any levels seems very irresponsible, not to mention a liability to the candle industry.

It is not unusual for consumers to question if wicks in the candles they buy contain lead. Consumer confidence has been shaken and rightly so. The candle industry knew of concerns of leaded wicks more than two decades ago and did not responsibly address the issue. The "voluntary" ban on lead wicks did not work. Who would be responsible for monitoring to be sure that lead levels did not exceed any established limit? Obviously neither the Consumer Product Safety Commission nor the candle industry has previously provided any monitoring. The bottom line is if the issue had been adequately addressed over twenty years ago, it would not be a concern now.

The simplest solution is to not use metal wicks. In reality any burning metal should be of concern. In the home environment there is exposure to those that are the most vulnerable. Unless it can be proven that metal wicks pose no health risks to the elderly, pregnant and nursing women, infants and children; these materials should not be used.

Alternate materials for wicks are available. And while making the switch may

increase costs slightly it certainly seems prudent to do so. Metal wicks
not
only pose a risk to the consumer, but also those that work in the
manufacture of candles. This is especially true of small manufactures
that
may be making candles in their kitchens and unwittingly exposing
themselves
and their families to lead.

Betty Bridges, RN
12602 Reed Rock Road
Amelia, VA 23002


Stevenson, Todd A.

Candle
17

From: John Hausbeck [JHAUSBECK@ci madison wi us]
Sent: Wednesday, June 07, 2000 8 49 AM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-3--Candle Wicks

To whom it may concern:

I would like to add my name to the petition before the CPSC to ban lead from candle wicks.

It is important for the CPSC to take this action to ban lead in candle wicks because it is a potentially serious source of lead to children. Many individuals use candles for personal enjoyment, relaxation, and many other uses.

Currently it is impossible for individuals that use candles to chose those that are lead-free. I strongly ask that, if a ban on lead in candle wicks cannot be achieved immediately, the CPSC take swift action to require candle manufacturers to lable candles that contain lead as such.

Thank you for your attention to this serious problem.

Sincerely,

John S Hausbeck, MS, RS
Environmental Epidemiologist
Madsion Department of Public Health
(608) 294-5315

Stevenson, Todd A.

Carroll

18

From: Barry Castleman [bcastle@bcpl net]
Sent: Wednesday, June 07, 2000 3 55 PM
To: cpsc-os@cpsc gov
Cc: SWOLFE@citizen org
Subject: Lead In Candles

Dear CPSC,

I am writing to agree with Public Citizen that there is no justification for the US government permitting ANY fraction of lead to be present in candles. There is already too much public exposure to lead from other sources, there is no "safe threshold" for exposure to lead, and there is simply no reason why the government should sanction the use of lead in any amount when the industry leaders have for many years observed a voluntary ban on lead in candle wicks

In addition, it is bad for the labor market and consumers in this country (and our country's international relations) if manufacturers can obtain CPSC's blessing to use toxic ingredients that are regulated here but not in some other countries, exposing the foreign workers and their families and environment to toxic devastation while exporting jobs from this country -- and then profiting by selling American consumers a hazardous product. This, I submit, does not warrant the CSPC seal of approval.

I hope that you will take swift action to prevent the sale of leaded candles in this country, there is no reason to drag out this rulemaking for years over such a simple issue.

--

Barry Castleman, Sc.D.
Environmental Consultant
bcastle@bcpl.net
2412 Pickwick Rd.
Baltimore, MD 21207 USA

Tel. 410-448-2648
Fax 410-448-2368

Candles

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Stevenson, Todd A.

From: rkfabf@aol.com
Sent: Wednesday, June 07, 2000 11 22 PM
To: Rkfabf@aol.com
Subject: [ukoh] CPSC Comments Needed by 6/12 - and a personal request

Fellow List Subscribers -

As you may have heard by now Public Citizen & Health Research Group has filed a petition to issue a legally mandatory ban & recall on the use of lead in candle wicks. I'm hoping to enlist your help by submitting your

comments in writing in support of enacting a mandated ban of lead in any &

all candles made or sold in the U.S. This is an action that is long overdue, necessary & attainable - but the deadline on June 12th is quickly

approaching. If you are active in other environmental & public health advocacy lists or groups or keep in contact with people that would support

this - it would be so appreciated if you could circulate this with some of

the groups you associate with. The petition needs all the support that can

possibly be brought together. This is truly a case of every letter counts or

they will & fully intend to sweep this again right under the rug with another

unenforceable, voluntary and basically meaningless, ban, clearly this is not

in the best interests or the safety and welfare of consumers, their families

& especially their children or even the "hands-on" candle makers themselves.

[The industry & their trade association are pushing for a more lax voluntary action rather than mandatory ban.]

This was an issue back in 1973 & 1974 & should have been taken care of then

but in spite of the EPA Administrator at the time urging a mandatory ban...a

voluntary ban was approved and then not complied with or even monitored. The

EPA study that Mr. Train references was performed in 1974 & determined that -

"Burning only two candles three hours each day on a regular basis in the

home could increase exposure to airborne lead by a factor of 5 or more. This

exposure to lead from candles could equal or exceed the exposure to airborne

lead associated with the busiest freeways in America." [keep in mind this was

a time when leaded gasoline was still fairly commonplace]. "Inhabitants of

homes in which lead wick candles are burned could be exposed to substantial incremental quantities of lead which, if continued on a regular basis would pose a significantly high risk to health especially among children." Mr.

Train goes on to say: "In my opinion candles represent an unnecessary incremental source of lead that can readily be controlled. It is my strong recommendation that the Consumer Product Safety Commission do all in it's power to prevent exposure to the substantial and unnecessary source of lead in candles."

To read the complete copy of the referenced letter & other related documents* go to: http://www.fiscorp.net/1aq/docs/

* These are all copies of documents from 1973 & 1974.

If you would like to read more on the current pending petitions, these 2 links will fill you in on the details:

Petition to ban lead candles [[http //www.citizen.org/hrg/PUBLICATIONS/1510.htm](http://www.citizen.org/hrg/PUBLICATIONS/1510.htm)]

Millions of Dangerous Candles Sold Throughout U.S.; Lead Wicks Pose Major Health & Safety Hazard, Especially to Children [<http://www.citizen.org/press/pr-s1d29.htm>]

At any rate, the CPSC is taking comments from the public regarding this proposal until June 12th. It's unbelievable that in the year 2000 we even need a petition & comment period to ban an insidious poison consumers may be unwittingly releasing into their homes & attempt to fix an erroneous policy on lead in candles from 26 years ago. But the fact remains that's where we stand now. I hope I can count on your participation in submitting comments, possibly even encourage like minded individuals to submit comments as well by sending this out to the other groups & individuals to which you are a member or have affiliations with.

The address where comments need to be sent:

Petition HP 00-3 Requesting a Ban of Candle Wicks Containing Lead and of Candles Containing Such Wicks - Comments accepted until 6/12/00 [<http://www.cpsc.gov/businfo/frnotices/fr00/wicks.html>]

ADDRESSES: Comments on the petition should be sent to:

E-Mail to: cpssc-os@cpssc.gov

With the subject heading "Petition HP 00-3--Candle Wicks
Containing Lead."

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207
telephone (301) 504-0800

OR delivered to:
Office of the Secretary, Consumer Product Safety Commission
room 502, 4330 East-West Highway
Bethesda, Maryland 20814.

Comments may also be filed by
Fax (301) 504-0127

Comments should be captioned ``Petition HP 00-3--Candle Wicks
Containing Lead.''

Please be sure to CC the following addresses.

SWOLFE@citizen.org,
plurie@citizen.org,
RKFABF@aol.com

My heartfelt appreciation to those who take the time to respond in
support of
this petition. I will keep the membership apprised of the petition's
progress.

Feel free to contact me off-list if you have any unanswered questions
pertaining to the petition or the issue in general.

Regards -
Cathy Flanders
IAQ List Manager & Moderator
E-Mail: iaq-owner@onelist.com

Fax # 781-394-8288
Personal E-Mail: RKFABF@aol.com
IAQ List - Home
<http://www.onelist.com/community/iaq>
IAQ List - Links
<http://www.onelist.com/links/iaq>

Candles and Indoor Air
Quality
<http://www.fiscorp.net/iaq/>
Homeowners Soot
Damage
Discussion
<http://disc.server.com/Indices/41692.html>

Paying too much for Long Distance is a global problem.
Join BeMANY! and Long Distance rates fall automatically.
http://click.egroups.com/1/4260/9/_/2164/_/960434697/

Visit <http://www.bohs.org/> and <http://www.bioh.org/>
for more information about Occupational Hygiene in the UK.

~~Stevenson, Todd A.~~

Copies

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From: mesandel [mesandel@bmc org]
Sent: Wednesday, June 07, 2000 2 00 PM
To: cpsc-os@cpsc gov
Subject: Petition HP 00-3--Candle Wicks Containing Lead

I am a pediatrician in Boston. I urge you to ban lead in candle wicks because it poses a great health risk to children.

Thanks Megan Sandel MD

Megan Sandel MD.
91 E. Concord St 4th floor
Boston Ma 02118
Office 617-414-3680
Fax 617-414-3679
Beeper 617-638-5795 #0330

Candle

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~~Stevenson, Todd A~~

From: CONARCH@aol.com
Sent: Wednesday, June 07, 2000 12:14 PM
To: cpsc-os@cpsc.gov
Cc: CONARCH@aol.com, plurie@citizen.org, Rkfabf@aol.com
Subject: "Petition HP 00-3--Candle Wicks Containing Lead"

Dear Sir:

Petition HP 00-3--Candle Wicks Containing Lead

Air quality issues should be of concern to everyone I am writing this in support of the effort to remove lead from wicks of candles. Lead is especially harmful to children and burning candles with leaded wicks can cause dangerous levels of lead.

Unless there is significant support to mandate a regulation it appears that the ban will be watered down to yet another voluntary action & .1% lead in wicks would still be permissible. I am of the opinion that a voluntary ban is not workable and as an easy out for the manufacturers

Having been in charge of a hospital chemistry lab that did lead screening, I have seen a number of elevated lead screens and definitive levels from Yale when the children were not chewing on old lead paint window sills and the housing pipes had been checked. Until I read about the air quality issues from lead wick candles, I always wondered where the lead had come from.

Living in a state where so many of our children suffer from asthma, allergies, ADHD, etc., anything that we can do to reduce preventable illness in our children should be our priority. I hope that my message can help persuade you to help.

Sincerely,

Constance L. Archambault, M.D. conarch@aol.com
Pathologist, emeritus
Midstate Medical Center Meriden, CT

~~Stevenson, Todd A.~~

Lundberg

JD

From: Tom Neltner [neltner@in net]
Sent: Wednesday, June 07, 2000 8 22 PM
To: cpsc-os@cpsc gov
Cc: Sarge Visher
Subject: Petition HP 00-3--Candle Wicks Containing Lead

Re: Petition HP 00-3--Candle Wicks Containing Lead

To whom it may concern:

Improving Kids' Environment is a non-profit organization based in Indianapolis, Indiana. IKE would like to support the comments made by the Alliance to End Childhood Lead Poisoning regarding lead in candle wicks.

Our nation has spent billions of dollars to remove lead from gasoline and paint. It has made extraordinary efforts to remove lead from drinking water and food containers. Yet, to my surprise, I just learned that lead is present in candle wicks. And a quick check to my local nick-knack store confirms that it is not a rare item. How can I explain to a mother whose child has been permanently damaged from lead or a landlord who is spending thousands of dollars to clean up lead-based paint that the Consumer Product Safety Commission has allowed this to happen. With the lead in wicks going right into the air and candles often used in confined areas, the situation is extraordinary.

Please adopt emergency regulations to effectively prohibit lead from candle wicks except for trace amounts - and enforce those regulations. Now is not the time for voluntary promises by the industry. The practice must stop!

Please confirm receipt of these official comments

Tom Neltner
Improving Kids' Environment
5244 Carrollton Ave.
Indianapolis, IN 46220
317-442-3973
or 317-283-5648
FAX 317-283-6111
Check out our website at <http://www.ikecoalition.org/home>

cc: Congresswoman Julia Carson

Stevenson, Todd A.

Landles 23

From: Jerome Paulson [hcsjap@gwia gwumc edu]
Sent: Wednesday, June 07, 2000 8 16 AM
To: Internet cpsc-os@cpsc gov
Subject: Petition HP 00-3--Candle Wicks Containing Lead

To Whom It May Concern:

Lead is a significant environmental hazard. There probably is no threshold level below which lead is not toxic. Lead causes developmental problems in children and peripheral neurologic problems in adults. Lead, when aerosolized as when burned in a candle wick, can be inhaled and the fallout can be ingested when picked up on children's hands. Lead should be banned from candle wicks forthwith.

Jerome A Paulson, MD
Associate Professor of Medicine, Pediatrics
& Community Health
Mid-Atlantic Center for Children's Health and the Environment
George Washington University
2150 Pennsylvania Ave, NW
Washington, DC 20037
Ph 202-994-9914
Fx 202-994-4861
E-mail hcsjap@gwumc edu

Candle

24

Stevenson, Todd A.

From: Kathy Dorn [activenow@hotmail.com]
Sent: Thursday, June 08, 2000 12:51 AM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-3--Candle Wicks

Please ban all lead used in the production of candle wicks.

Kathy Dorn

Get Your Private, Free E-mail from MSN Hotmail at <http://www.hotmail.com>

Candles

25

Stevenson, Todd A.

From: PELPLA@aol.com
Sent: Thursday, June 08, 2000 12:04 AM
To: cpsc-os@cpsc.gov; SWOLFE@citizen.org, plurie@citizen.org, Rkfabf@aol.com
Subject: Petition HP 00-3--Candle Wicks Containing Lead

I am in support of the subject petition and action being taken to eliminate lead and any other metals from candle wicks that can be vaporized in homes and expose homeowners to harmful materials.

In my experience, the candle industry has been very slow and poor in labeling candles with additives that have emitted soot and carbon monoxide in residential homes. I don't expect the candle companies I know to willingly police themselves in this matter of eliminating lead. I trust that the CPSC will push corrective on the candle industry. It is 'humorous' in an ugly way to have warnings out in the open on cigarette packs and beer containers and still allow candle manufacturers to place their "so called warnings" on the bottom where no one will see them. Thank you for your action in this matter.

Paul E. Lutz
Chemical Engineer and
Expert Witness
Paul
Lutz
Associates

Candle

Stevenson, Todd A.

26

From: Gammarino, A. Craig (A&E Services) [CraigG@FAC.UNC.EDU]
Sent: Thursday, June 08, 2000 8 56 AM
To: 'cpsc-os@cpsc.gov'
Subject: Petition HP 00-3--Candle Wicks Containing Lead

Dear CPSC Folks:

It is obscene that lead has not been totally banned in all products that contribute lead compounds to indoor (and ambient) air, and I am writing to support such an immediate ban. Thank-you. Sincerely, Craig Gammarino, PE

~~Stevenson, Ted A~~

Candles

27

From: Peter Wood [pandemonium@icon.co.za]
Sent: Thursday, June 08, 2000 1:23 AM
To: cpsc-os@cpsc.gov
Cc: rkfabf@aol.com
Subject: Lead in candle wicks



[ukoh] CPSC Comments Needed by .

Given that metallic lead melts at just over 400

degrees C, that molten

lead

has a significant vapour pressure, and that inhalation of lead fumes at very

low levels has been proven to affect the intelligence of children; and further that lead accumulates in the body and is a long-recognised industrial poison, it is incomprehensible to me that lead may still be used

as a stiffening agent or whatever in candle wicks in the USA. I might expect

this situation in a third-world country, but not in the USA in 2000.

If lead is used in candle wicks, it should be removed and substituted with

another, less toxic product - possibly aluminium or even tin, or perhaps a

polymer stiffener.

I feel strongly that the proposers of the ban on lead in candle wicks should

not only "cry wolf", but should also research possible alternatives & should

suggest less toxic substitutes - but lead is unacceptable in candle wicks.

Peter Wood
Safety Chemist / Occupational Hygienist
South Africa
pwood@icon.co.za

Post-It Fax Note 7672

To CPSC.

Company

Location

Fax # 301 504.0127

Comments

Telephone #

No of Pages 4
From M Borgiatti
Company
Location
Fax #
Original Disposition
Jun 7 '00 18:17 P.01
6/7/00
Dept. Charge
Telephone # 517 335 8948
 Destroy Return Call for pickup

Carroll
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Date: 7. June 2000

To: Office of the Secretary
Consumer Product Safety Commission

From: Michele Borgiatti, M.P.H., M.S.W.
Dominic Borgiatti, M.P.H., D.O.

Re: Petition HP 00-3 -
Candle Wicks Containing Lead

I, Michele Borgiatti, work at the Michigan Department of Community Health in the Lead Hazard Remediation Program; however, I'm not writing this letter as a representative of my agency. Rather I'm writing it on behalf of my family and other families within my circle of friends and family in Michigan and throughout the country. Candles are a very popular home item and are usually what I think of in terms of gifts; some, I know, have contained lead wick cores. I have scented candles at home that have metal cores. I also have a 2-year old daughter.

Her name is Cypress. My husband and I burn candles, up high, in her presence. Because of my access to information about lead items, I became aware of the risk of this behavior. I would assume that lead vapors from burning candles is very absorbable into the lungs of young children, as well as adults and pregnant women. It takes very little lead in the blood of a pregnant woman to cross the placenta and begin circulating with the fetus' blood; causing nerve damage as the system is forming.

I ask that the CPSC act in my best interest from a health perspective, in addition to the health of ~~my~~ our young Cypress to:

- 1) allow the use of only special high grade zinc wire with only trace amounts of lead for wicks in candles and wicks
- 2) not draft a voluntary agreement with the candle-making industry; rather a regulation banning the manufacturers of lead cores

It is true that most children in this country with lead poisoning are poisoned by lead-based paint that has disintegrated into house dust. However, during investigations by local health departments to the homes of these unfortunate children, the investigator is always looking for other contributing sources besides lead paint and dust. Lead exposure is cumulative in young kids and can and does come from many different sources, candles now also being one of them. The costs for identifying and treating lead poisoned children is expensive. The testing, the medical follow-up, hospitalization if necessary, Medicaid investigations to the home to identify the sources, Medicaid health education visits to the home to teach the family how to avoid further exposures to lead, special education may be needed, school delinquency is common as research suggests, and some young adults with prior lead exposures as kids end up in the criminal justice system.

4.

The costs to our society and pocket books are great, but hidden to most of us. I didn't mention a parent's anguish in knowing their child is potentially damaged a little bit, and will have less of an edge in school and life because they have lead poisoning. As parents become educated about their child's disease, they always learn that they could have prevented the exposure if they only knew how. This, as a parent, is very hard to emotionally digest!! So, lead poisoning ~~is~~ preventable.

The CPSC banned the use of lead in paint in 1978. Thank you for this. However, please entertain these comments and the petition to ban lead in candles and candle wicks to further protect children and families in their homes that we all are striving to make safer.

Thank you —

Stevenson, Todd A.

Candles 29

From: Janinetm@aol.com
Sent: Thursday, June 08, 2000 11:05 AM
To: cpssc-os@cpssc.gov
Cc: plurie@citizen.org, SWOLFE@citizen.org, Rkfabf@aol.com
Subject: Petition HP 00-3--Candle Wicks Containing Lead

Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

Dear Madam or Sir,

I am writing in support of Petition HP 00-3--Candle Wicks Containing Lead. It is the responsibility of the Consumer Product Safety Commission to protect citizens from hazardous consumer products, and lead in candle wicks is certainly one of them.

Your own standards say that "the adverse health effects of lead poisoning in children are well-documented and may have long-lasting or permanent consequences. These effects include neurological damage, delayed mental and physical development, attention and learning deficiencies, and hearing problems. Because lead accumulates in the body, even exposures to small amounts of lead can contribute to the overall level of lead in the blood and to the subsequent risk of adverse health effects. Therefore, any unnecessary exposure of children to lead should be avoided."

Given this statement it is hard to understand why lead is allowed in candle wicks today, and it is obvious this practice must stop. Candles are often used in homes where young children are present and, as you yourselves say, the lead from the burning of these candles accumulates in children's bodies leading to neurological damage, delayed mental and physical development, attention and learning deficiencies and hearing problems. Lead from candles is certainly an unnecessary exposure and, therefore, should be banned immediately.

We, as a society, are concerned about the youth of today. We constantly hear that test scores are decreasing, that crime by young people is becoming more violent. Banning lead in candle wicks seems like a small price to pay if it can help in any way. Candles don't have to have lead in wicks. There are other alternatives, and some responsible companies already use these alternatives. For those companies who have dug their feet, it is time to say

"stop." We need to put the health of citizens, especially the most vulnerable such as children, first.

Please ban lead wicks in candles now!!!

Sincerely,
Janine Melrose
P.O. Box 2885
La Crosse, WI 54602

Stevenson, Todd A.

Candle 30

From: Robin S [ris63@hotmail.com]
Sent: Thursday, June 08, 2000 3:14 PM
To: cpssc-os@cpssc.gov
Subject: "Petition HP 00-3--Candle Wicks"

Like most candle-users, I imagine, I was shocked and dismayed to discover that the wicks of my candles contain lead which becomes airborne when the wicks are lit. This is an incredible outrage. On what basis has the Consumer Product Safety Commission determined that lead is an integral part/component/ingredient of a candle and how is it that you have determined the resulting lead exposure is an "acceptable" risk? It is only acceptable if the buying, breathing public knows of the risk and, with that knowledge, accepts the risk. Up 'til now, we've assumed that burning our aroma therapy candles is actually somewhat beneficial. HA! We've also wrongly assumed that CPSC has been looking out for us, protecting our health and welfare. I am justifiably irate. As a tax-paying US citizen, I want to urge the CPSC to "do the right thing" and immediately declare a mandatory ban on lead in candles.

Get Your Private, Free E-mail from MSN Hotmail at <http://www.hotmail.com>

Stevenson, Todd A.

Candles
31

From: JMDia@aol.com
Sent: Thursday, June 08, 2000 2:46 PM
To: cpsc-os@cpsc.gov
Cc: SWOLFE@citizen.org, plurie@citizen.org, Rkfabf@aol.com
Subject: Petition HP 00-3--Candle Wicks Containing Lead

Dear Sirs:

As a pediatrician, I'm MANDATED to perform blood tests on children, looking for elevated lead levels. I certainly feel that if the behavior of pediatricians can be mandated by government, because of the concern that

society feels regarding lead toxicity to children, that candlemakers should be apprised that it is no longer acceptable to put lead (or any other toxic heavy metal) in candle wicks.

If voluntary controls were appropriate, they should by now--after more than 20 years--have achieved the elimination of this hazard. It's time now for a mandatory ban and a recall on candles with leaded wicks.

With thanks for your attention,

James M. Diamond, M. D.

Berkeley, CA 94703

Fellow, American Academy of Pediatrics

Stevenson, Todd A.

Candles
32

From: Charles Miller [rellim@mailhost.tcs.tulane.edu]
Sent: Thursday, June 08, 2000 1:17 PM
To: cpsc-os@cpsc.gov
Subject: lead-containing candles and wicks

Dear CPSC,

As both a parent of young children and a professional toxicologist, I want to voice my concern over the issue of lead-containing candles and wicks. The burning of such candles introduces lead into the home environment and contributes to the exposure of adults, children, and fetuses (the latter two groups are known to be especially sensitive to low lead levels). I urge you to do your best to remove this source of lead exposure from the home environment. To my knowledge there is no important reason that requires candles to contain lead in order to function properly, but there are very good reasons (e.g., health) why candles should not contain lead. I hope that you will support the pending petitions to ban and recall this source of lead.

Sincerely,

Chuck Miller

--

Charles A. Miller, III, Ph.D.
Associate Professor of Environmental Health Sciences
Tulane University School of Public Health and Tropical Medicine
1430 Tulane Ave.
New Orleans, LA 70112
(504) 585-6942 rellim@mailhost.tcs.tulane.edu

Candles
33

~~Stevenson, Todd A.~~

From: Nancy Harrison [nharr@gte.net]
Sent: Thursday, June 08, 2000 4:01 PM
To: cpsc-os@cpsc.gov
Subject: Petition HP00-3--Candle Wicks

Add my name to this petition; some truths really are self-evident. Why does there even have to be comment from the public on this? You (EPA) people are supposed to be protecting us! Drs. John and Nancy Harrison

FREE Personalized Email at Mail.com
Sign up at <http://www.mail.com/?sr=mc.mk.mcm.tag001>

~~Stevenson, Todd A.~~

Candles

34

From: Kip Flanders [kflanders@ntscdallas.com]
Sent: Thursday, June 08, 2000 7 58 PM
To: cpsc-os@cpsc.gov
Cc: swolfe@citizen.org, plume@citizen.org
Subject: Petition HP 00-3-- Candle Wicks Containing Lead

A ban of leaded wicks in candles is absolutely mandatory. The government of Australia banned these types of wicks/candles almost immediately after becoming aware of the problem. I am baffled that the CPSC is just now taking this into consideration after having knowledge of this issue since 1973! The health risks to children from the inhalation of lead fumes produced by these wicks/candles is imminent and extremely dangerous.

How can you, the CPSC, ban zippers which have been painted with lead paint and are on the jackets that children wear, and not ban leaded wicks and candles? Are you aware that the UK and Canada are very near a ban at this time? If you invoke a voluntary ban, as was the deal between the CPSC and the National Candle Association in 1973, you will be acting irresponsibly and not protecting the consumer as your job/jobs call for. The ban in 1973 was never adhered to and I am quite sure you can expect the same results in 2000. Things have not changed that much. If Al Gore is elected president of this country would he support a voluntary ban? I think not and if I am an employee of this government I would keep that in mind as well. The reason to ban and enforce this ban is what your entire organization is all about, keeping consumers safe! Why can't you do that and stop playing petty politics? Is the National Candle Association more important to you than the health and possibly lives of the citizens of this Nation?

I intend to make the various news outlets aware of this situation and the so-called "ban" you entered into agreement with the National Candle Association on in 1973. If you make the wrong decision, and either don't ban these wicks or propose a mandatory ban, you will be guilty of injuring countless hundreds of thousands, if not millions of children. The purpose of your Commission is to protect us from insidious products like these, not to help promote them and the profits of the few represented by these products.

Kip Flanders


Stevenson, Todd A.

Candles

35

From: Loring Pitts [loringp@sprintmail.com]
Sent: Thursday, June 08, 2000 9 03 PM
To: cpsc-os@cpsc.gov
Subject: Petition to Ban Lead in Candle wicks

I am Opposed to the petition

Carroll

36

~~Stevenson, Todd A.~~

From: Pam Smith [psmith@ntscdallas.com]
Sent: Friday, June 09, 2000 2 02 AM
To: cpssc-os@cpssc.gov
Cc: SWOLFE@citizen.org, plurie@citizen.org; rkfabf@aol.com
Subject: Petition HP 00-3 -- Candle Wicks Containing Lead

To Whom It May Concern,

Please add my name to this petition.

Regards,

Pam Smith

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We need to learn to set our course by the stars,
not by the lights of every passing ship.

- Omar Nelson Bradley

Candles

~~Stevensdn, Todd A.~~

37

From: McGrath, Tom [Tom.McGrath@ps net]
Sent: Friday, June 09, 2000 9:30 AM
To: 'cpsc-os@cpsc.gov'
Cc: 'SWOLFE@citizen.org'; 'plurie@citizen.org'; 'rkfabf@aol.com'
Subject: Petition HP 00-3 -- Candle Wicks Containing Lead

I am writing to add my name to the petition to remove lead from candle wicks. I love candles. I also love my children. If the CPSC can not see the damage that they are causing to my family and others who visit my home then they need to look much deeper into the issue. ACTION not just strong words must be the course taken here. Things to remember: Times Beach.....how long did it take until many houses had to be plowed into the ground due to contaminated water ?

Tom McGrath

(301) 504-0127
Connelly
38

June 10, 2000

To the United States Government,

Please get the lead out of candle wicks. This is crazy. Why is it that industry is allowed to risk our health?

Linda J. McElver
1930 Castillo Ct
San Luis Obispo, CA 93405

Linda J. McElver

~~Stevenson, Todd A.~~

Candles
39

From: Jena Roberson [jenaroberson@hotmail.com]
Sent: Friday, June 09, 2000 1 55 PM
To: cpssc-os@cpssc.gov

I am writing to you to demand you ban lead or metal wicks in candles.
This
has gone on long enough and after 30 years, something has to be done
about
it. Thank you. Jena L. Roberson Richardson, Tx. 75080

Get Your Private, Free E-mail from MSN Hotmail at <http://www.hotmail.com>

Stevenson, Todd A.

Candle 40

From: Weaver, Susan (NREPC, DAQ) [Susan.Weaver@mail.state.ky.us]
Sent: Friday, June 09, 2000 4:03 PM
To: 'cpsc-os@cpsc.gov'
Subject: Petition HP 00-3--Candle Wicks Petition HP 00-3--Candle Wicks

It is imperative that government regulatory agencies get a handle on the problem of lead in candles. The average consumer is not informed and once informed is shocked that such a possibility (as lead in candle wicks) is even a possibility. There are no labels, there is no posting at point of sale, the consumer is an unwitting participant in poisoning the "household environment" for themselves and their children.

Why did we spend billions & billions of government dollars removing lead from gasoline to reduce exposure, and more dollars removing it from paint, only to allow unscrupulous candlemakers poison the home environment with high levels lead in candle soot?

Any proposal to correct this situation can only be a good and necessary thing.

Susan Weaver, Environmental Tech III
Evaluation Section, Program Planning Branch
Kentucky Division for Air Quality
502.573.3382 ext. 389
502.573.3787 fax
email: susan.weaver@mail.state.ky.us

~~Stevenson, Todd A.~~

Candela

41

From: Mary Pjerrou [pirohuck@mcn.org]
Sent: Saturday, June 10, 2000 7:30 AM
To: cpssc-os@cpssc.gov
Subject: Lead poisoning from candles

From:

Mary Pjerrou
Redwood Coast Watersheds Alliance
P.O. Box 90
Elk, CA 95432

Date: June 7, 2000

To: Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

Dear Consumer Product Safety Commission:

I am writing to you on an issue of vital importance to the health and well-being of children and adults who become inadvertently exposed to lead that is burned in the wicks of candles. The candle industry has told you that this matter does not need regulation. I assure you that it does, and that the regulation must be stringent and strictly enforced.

Children who are exposed to lead can suffer permanent brain damage. This is a totally unacceptable risk for the Consumer Product Safety Commission to take, by failing to regulate or weakly regulating the use of lead in candle wicks. I live in a rural area. Candles here are not a cosmetic or decorative item. They are a necessity, for we have frequent power outages. Purchasing and burning candles is not an option for us. It is shocking to me that you have allowed consumers to go this long without being aware of the danger of lead in candle wicks, and without preventing that danger by the simple means of forbidding such a use of lead.

I am President of the Redwood Coast Watersheds Alliance, an alliance of 11 local environmental groups in the redwood region of California. Here we have not only the problems of destruction of the redwood forest by corporate loggers, but also the extensive use of toxic herbicides in clearcutting areas. What we have seen here is the unwillingness and inability of our government to protect public trust resources such as the redwood forest, and to prevent the poisoning of our environment.

The Fishers of the Gap clothing stores have invested in redwood logging. They purchased 235,000 acres of Louisiana Pacific's cutover forests in

Mendocino and Sonoma Counties, and have been logging them now for two years. They are clearcutting, using toxic herbicides and taking the last merchantable trees from these forests. They are in fact destroying these forests once and for all. Then we find out that Gap stores (including Banana Republic and Old Navy) are using sweatshop labor in the Mariana Islands and elsewhere to sew Gap clothes. And on top of this, we find out that the Gap has been selling candles with lead wicks that have poisoned peoples' homes and endangered their children.

Empires such as the Gap need to learn that their riches come only by the blessing of their consumers and that behaviors such as those described above are unacceptable in civilized, democratic society. Many of us don't have much faith left that the government that we elect will act in the interest of its citizens, and will resist corporate and campaign contribution influence. But there is always hope that you will. You have the opportunity, in the case of lead in candles, to protect citizens from an obvious and easily preventable danger. Please do your duty.

Mary Pjerrou
President
Redwood Coast Watersheds Alliance

Carde
42

~~Stevenson, Todd A~~

From: Visher, Sarge [Sarge Visher@mail.house.gov]
Sent: Saturday, June 10, 2000 6:16 PM
To: 'cpsc-os@cpsc.gov'
Subject: Petition HP 00-3-Candle Wicks With Lead

Re: Petition HP 00-3--Candle Wicks Containing Lead
By E-Mail: cpsc-os@cpsc.gov

Office of the Secretary
Consumer Product Safety Commission
Room 502
4330 East-West Highway
Bethesda, Maryland

Dear Mr. Secretary:

We have spent a lot of money and energy in this country to reduce the exposure of our young people to lead. As a nation, we must apply more effort to see to the elimination of existing lead and to deal with its effects on young people already poisoned. I write to urge that every means at your disposal be used to help reduce lead in America's households.

Specifically, I join with the voices of concern, urging that the Consumer Product Safety Commission act to prevent the introduction of lead from new sources into our homes.

The use of lead in the manufacture of candle wicks is an important and frightening source for unwitting contamination. Lead in the air, especially in today's modern and relatively air-tight homes, when breathed by children' threatens intellectual damage just as surely as lead in the paint of our older homes.

I advocate the adoption by the Commission of emergency regulations to keep candle wicks with lead from reaching America's homes.

Julia Carson
Member of Congress, CD 10, Indiana
300 East Fall Creek

Parkway, N. Drive

Indianapolis, IN 46205
317-283-6516

Candles

43

~~Stevenson, Tedd A.~~

From: Johnson, Tom (Audit Dallas), Celanese/US [tsjohnson@celanese.com]
Sent: Saturday, June 10, 2000 6.45 PM
To: 'cpsc-os@cpsc.gov'
Subject: Leaded Wicks in Candles

I trust that now that there is scientific evidence readily available on the internet to all, the CPSC will take the necessary steps to protect U.S. citizens. The voluntary ban that the National Candle Association agreed to in 1974 has obviously been ineffective. (In case any of the decision makers are not aware of the problem, here are two of the many internet sites that provide information on the subject.)

<http://www.sdearthtimes.com/et1199/et1199s5.html>

http://www.phillynews.com/daily_news/2000/Feb/25/national/CAND25.htm

I, for one, knew nothing about the potential danger until I read these articles today. But there appears to be one inconsistency in the stories. If CPSC spokespersons are currently saying that "We don't know that there is any kind of health hazard associated with leaded candles."- why was a voluntary ban sought at all 26 years ago? I will be sure not to burn leaded wick candles in my home in the future. Please, do the right thing, and protect others who are not aware of the problem. Ban leaded wicks and lead in candles.

Sincerely,
Tom Johnson

phone: 972-443-4722
fax: 972-443-8595
e-mail: annetomtx@earthlink.net

Conrad
44

~~Stevenson, Todd A~~

From: Deb [drh1998@earthlink.net]
Sent: Sunday, June 11, 2000 10:03 AM
To: cpsc-os@cpsc.gov
Subject: Petition HP 00-3--Candle Wicks Containing Lead

It is imperative that we ban candles containing lead. We must start removing toxic substances from our everyday lives and workplaces.

Debra Goodin-Wellever
drh1998@earthlink.net

Candle

45

~~Stevenson, Todd A.~~

From: Kent Roecker [krocker@airmail net]
Sent: Sunday, June 11, 2000 2:03 PM
To: cpsc-os@cpsc.gov
Cc: SWOLFE@citizen.org; plurie@citizen.org, rkfabf@aol.com
Subject: Petition HP 00-3 -- Candle Wicks Containing Lead

In response to an email I received from my friend Kip Flanders in regards to the referenced item, I support the ban of such wicks

Thank you

Kent Roecker

~~Stevenson, Todd A.~~

candles

46

From: Connie Ho [ruby2_57@hotmail.com]
Sent: Sunday, June 11, 2000 2:05 PM
To: cpsc-os@cpsc.gov
Subject: Petition to ban lead wicked candles

To All This May Concern:

Our family was injured by a chemical which had a large amount of lead in its chemical make up. It was oxidized and put into the air. The damage and amount of lead in our tissues has remained very high because we breathed in the lead through our lungs. The lungs are a very vascular area and your

body uses the good elements in the body to try and remove it from the body.

In using up the good elements more lead is taken up into the tissues.

All tissues in the body are a target for lead. Especially the brain. Our seven year old who was injured cannot learn to spell or use a dictionary, which is terrible because she has such an imagination but cannot write on her own. She has not been able to do math. The older children who won presidential scholarships for academics are failing.

They cannot remember what they read. This will end up an uneducated and uneducable society if we continue to allow any lead, especially lead which is oxidized into the air to be used.

This population of children will always have to be supported and are very frustrated that they are unable to make a living. My husband says one thing and does another and doesn't realize he is doing it.

We have undergone 1 1/2 years of chelation and nutritional therapy but the lead remains and our brains are fading. We suffer continuously from anemia

and cannot be in any room with petroleum based perfumes. Yes, perfume, deodorizers, shampoo, detergents, common household pesticides all contain

huge amounts of lead. Once injured, the body sucks in whatever elements the

cell is a target to. And unwitting innocent people are injured and become

unproductive citizens, no longer producing taxable income but using medicare

and social security. We would prefer to be tax payers. Then a tax burden.

Please forgive my writing and spelling too. I also got skin cancer, malignant melanoma from laying in the chemical. Remember the angels are

watching, they know we are hurting one another for the price of a dollar but

in the end there is a price for poisoning our people. Connie Ho, 47 Maple

Hill Drive, Chagrin Falls, Ohio 44022 (the contaminated house)