

61736-1009

REGULATORY AND TECHNICAL ASSOCIATES

73 FRANKLIN TPK. ALLENDALE, N.J. 07401

9/29/03

Managing Director
Sinolink Enterprise (HK) Ltd.
Room 34 New Henry House
10 Ice House Street
Central
Hong Kong

Re: RTA LHAMA Report 03-77

Dear Sir:

As a board certified toxicologist, I have been requested to review TWO GLITTER GLUES, one with glitter ("Sparkle Writers"), one with confetti ("Confetti Glitter Glue") (9/25/03 email to RJS) along with the components for hazard. In compliance with FHSA and specifically CPSC's LHAMA regulations, I am writing to inform you that my reviews have included all criteria as outlined in ASTM D-4236. Those criteria were submitted to CPSC.

Each of the materials indicated above has passed the requirements for chronic toxicity as outlined in the ASTM D 4236 test, the LHAMA Law of the United States Consumer Product Safety Commission.

The review took into account all available data, including the relevant data from NTP, IARC and other sources to assess the need for chronic health hazard warnings. This review considered carcinogenicity, reproductive hazard, neurotoxicity, etc. As well, relevant data concerning bioavailablility and exposure were considered. In the absence of specific data, reasonable judgements were made to assure a realistic assessment of hazard was reflected on the ultimate art material package.

The proprictary formulas are on file at RTA, Inc. Only indicated formula(s) apply to the contained herein advice. Please advise if there are any alterations to formulas.

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The ultimate assessment of hazard was based upon identity of the art material formula and its ingredients as revealed by suppliers of raw materials and the finished product. Health and safety data was also supplied and considered.

The formulas which have been determined to conform with the regulation can be labeled as follows:

"Conforms to ASTM Practice D-4236"

Alternative language as outlined in FR 57 No.197 pp. 45679 is also acceptable.

This review will need to be updated, every five years or in the event of a formulation change of upon you or me becoming aware of new safety information. Also, in the event of a changes in the CPSC Guidance documents concerning this regulation, we will need to comply with them in all respects

Please contact me should you have any questions.

Sincerely

Robert J. Sizabi Ph D. Diplomate, American Board of Toxicology

Certified Regulatory Affairs



MATERIAL SAFETY DATA SHEET

Sinolink Enterprise (HK) Ltd. Contact: Jan Bitcon
1725 Star House Phone: 852-2735-1068
3 Salisbury Road Fax: 852-2730-3026
Tsim Sha Tsui E-mail: janbitcon@aol.com

Hong Kong

1. <u>Product Identification</u> Glitter Glue Pen Set

2. Composition / Information on Ingredients

Contains: Water, Polyethylene Terephthalate, Acrylates Copolymer, PVP, Polyvinyl Alcohol, Polysorbate 20, Propylene Glycol, Phenonip, Tirethanolamine, Lauramidopropyl Betaine 30%, Carbomer and Parfum. Does not contain any substance presenting a health hazard.

3. Physical and Chemical Properties

Pure Material or Mixture: Mixture

Physical Form: Viscous liquid

Appearance / Physical Description: Colored viscous liquid

Odor Threshold: Not available (slightly perfumed) pH: 7.5 – 8.5

pH: 7.5 – 8.5
Boiling Point: >212° F
Melting / Freezing Point: <32° F

Partition Coefficient (n-octanol/water): Not applicable

Specific Gravity (Water = 1): 1.04

Bulk Density: 8.6 lb. / gal

Volatiles: 75% / wt. Evaporation Rate (Water = 1):

Vapor Pressure: 17.5 mm Hg @ 20° C (68° F)

Vapor Density (Air = 1): 0.62

Volatile Organic Compounds: 202 g / 1

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Autoignition Temperature:

Flash Point:

Oxidizing Properties: Solubility in Water:

Unknown Not applicable Not applicable Dispersible

4. Hazards Identification

HMIS Hazard Ratings for Product

Health: Flammability: 0 Reactivity:

0 Personal Protection:

See Section 9

2 = Moderate 3 = Serious 4 = Severe

0 = Minimal

1 = Slight

= Chronic Effects

5. First Aid Measures

Eye Contact: Flush eyes with large amounts of water until irritation

subsides. Consult a physician if irritation persists.

Skin Contact: Wash affected skin areas thoroughly with soap and water.

Consult a physician if irritation persists.

Inhalation: Move subject to fresh air.

If swallowed, give two glasses of water to drink. Immediately Ingestion:

Contact poison control center, hospital emergency room or physician for any other treatment directions. Never give

anything by mouth to an unconscious person.

6.. Fire Fighting Measures

Autoignition Temperature: Unknown

Flash Point: Not applicable **Upper Explosive Limit (%):** Not applicable

Lower Explosive Limit (%): Not applicable

Extinguisher Media: JEGOz, Dry Chemical Foam – Use

extinguishing media appropriate for

surrounding fire Not applicable

Special Firefighting Procedures: Fire & Explosion Hazards: Not applicable NFPA Flammability Hazard Class: 0 = insignificant

7. Accidental Release Measures

Spill or Leak Procedures: Spills should be taken up with suitable absorbent material and placed in containers. Spill areas can be washed with water; collect wash water for approved disposal. Do not flush in storm sewer or waterway.

8. Handling and Storage

Storage Temperature:

40° - 100° F

Handling / Storage:

Protect from freezing. Keep container sealed

when not in use.

Ventilation Requirements:

General

9. Exposure Control and Personal Protection

Conditions under which Personal **Protective Equipment Required:**

Normal work conditions, maintenance /

repair. Recommended that working

Eye Protection Requirements:

None required. None required

Glove Requirements: Clothing Requirements:

Protective clothing is normally unnecessary

for foreseeable conditions of use.

Recommended that children wear old clothes

Area be covered with cloth or old newspaper.

or overalls.

Wash Requirements:

Stains may be removed by soaking overnight then washing with soap and warm water. Scrubbing can help. Do not use bleach, chemical cleaners or biological washing

powder.

Respirator Requirements:

None required under normal handling

∰conditions.

Ventilation Requirements:

General

10. Stability and Reactivity

Stability:

Normally stable as defined in NFPA 704-12

(4-3.1)..

Incompatibilities:

Materials that react with water.

NFPA Reactivity Hazard Class:

0 = insignificant

Hazardous Decomposition Products: Carbon Monoxide, Carbon Dioxide

Hazardous Polymerization:

Will not occur

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11. Toxicological Information

Route of Entry Short Term Effects of Exposure

Acute Effects – Eye: Slight, transient

Acute Effects – Skin Contact:

Acute Effects – Inhalation:

Acute Effects – Ingestion:

No hazard in normal commercial use
No hazard in normal commercial use

Long Term Effects of Exposure

Effect of Chronic Exposure: This product should be considered non-

hazardous and has no known chronic effects.

Target Organs: Not applicable. Carcinogenicity: None

12. Ecological Information

No applicable data.

13. Disposal Considerations

Waste Disposal Methods: Waste disposal should be in accordance with

existing Federal, State and Local environmental

regulations.

Empty Container Warnings: Empty containers may contain product residue,

follow MSDS and label warnings even after they

have been emptied.

14. Transport Information

U.S. Department of Transportation Information

DOT Shipping Name: Paints or Stains 149980 Sub. 3

DOT Hazard Class:

DOT Reportable Quantity:

Non-hazardous

None

Canadian Transportation of Dangerous Goods

(TDG)

Non-Regulated.

Ass.

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United Nations Transportation Information

U.N. Number: U.N. Class:

None None

15. Regulatory Information

TSCA: All components are on the TSCA Inventory

Not considered a dangerous substance or preparation within the meaning of European

Directives 67/548/EEC and 88/379/EEC.

FDA: 21CFS175.105. Not considered to be toxic, or an

eye / skin irritant as defined in the Federal

Hazardous Substances Act (16 CFR 1500.3 (b) (5)

and 16 CFR 1500.3 (b) (8).

SARA/Title III: This product contains no substances at or above

the reported threshold under Section 313 of Title III of the Superfund Amendment 48 and Reauthorization Act of 1986 and subpart C – Supplier

Notification Requirement of 40 CFR Part 372 based

on available data.

ASTM D-4236: Products bearing the Non-Toxic Product Seal are

Certified in a program of toxicological evaluation by a nationally certified toxicologist to contain no Materials in sufficient quantities to be toxic or injurious to humans or to cause acute or chronic health problems. These products are certified to be labeled in accordance with the voluntary chronic

hazard labeling standard ASTM D-4236. In addition, there is no physical hazard as defined

within 29 CFR Part 1910.1200 (c).

16. Other Information

Creation Date: September 1, 2004

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User's Responsibility:

The OSHA Hazard Communication Standard 29 CFR 1910.1200 and the Workplace Hazardous Materials Information System (WHMIS) require that the information contained on these sheets be made available to your workers. Education and train your workers regarding OSHA and WHMIS precautions. Instruct your workers to handle this product properly. Consult with appropriate experts to guard against hazards associated with use of this product and its ingredients.

Disclaimer:

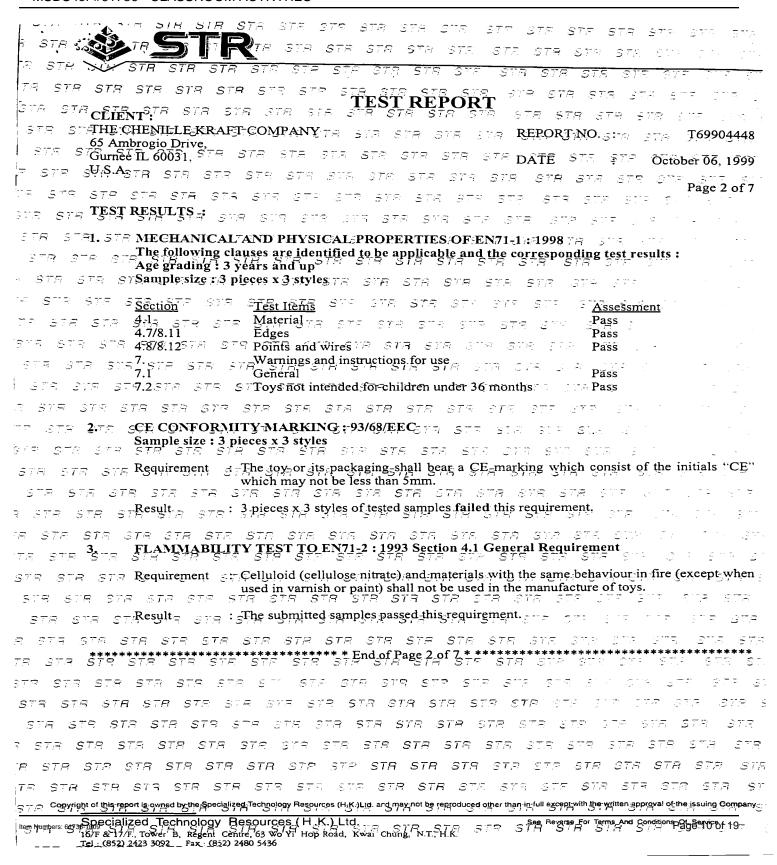
The information given and the recommendations made herein apply to our product (s) alone and not combined with any other product (s). Such are based on our research and on data from other reliable sources and are believed to be accurate. No guarantee or accuracy is made. It is the purchaser's responsibility before using any product to verify this data under their own operating conditions and to determine whether the product is suitable for their purposes.

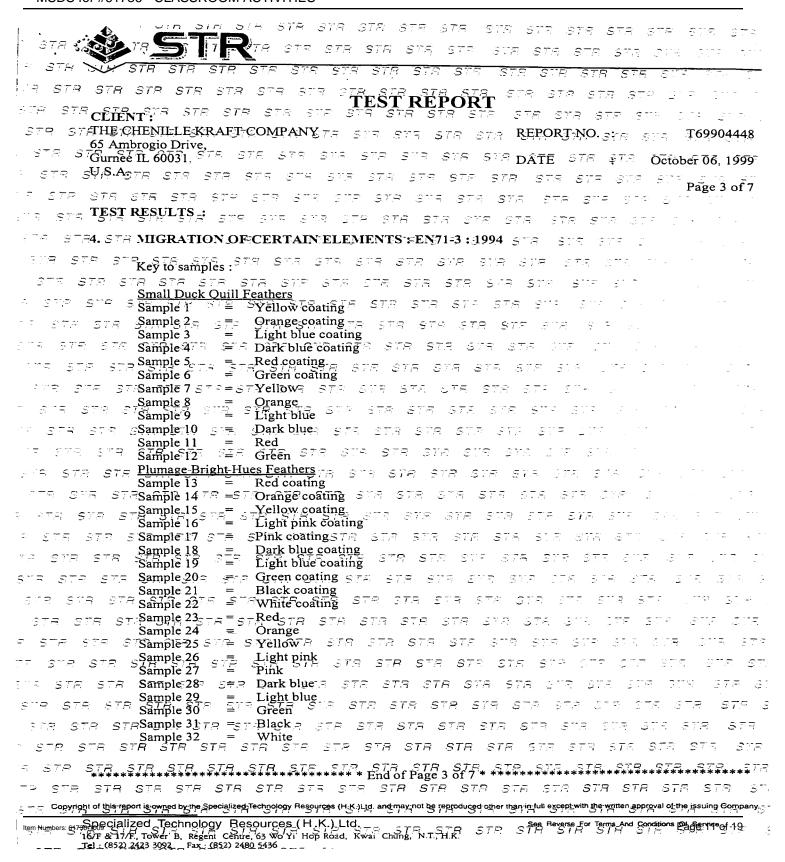
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16/F & 17/F, Tower B, Regent Centre, 63 Wo Yi Hop Road, Kwai Chung, N.T. H.K. Tel: (852) 2423 3092. Fax: (852) 2480 5436





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Sample 33 STE SYEllow coating Sample 34* Orange coating --9 SIR Sample 35 Red coating = · - <u>-</u> 3₹75 Green coating SYS \mathcal{S} Sample 36-7 STSSample 37-Sample 38* Pink coating Dark blue coating - 5 sT ε STASample 39378 = ST.OrangeR STR STR 379 Sample 40 Black with orange spots Sample 41 Green SSample:42 ទក្ខ 375 Black with green-spots Sample 43 Pink SEP Black with pink spots 578 Ξ Sample 44 STA Sample 45-A STR Yellow STR STR STR Sample 46 Black with yellow spots STRSample 47 TR =STADark/blueSTR STR STR = S7Black with dark blue spots Sample 48 Sample 49 Red STR SSample 50 STA SBlackswith red spots TR STR White plastic feather handle Transparent plastic feather handle Sample 51 Sample 52 STE STR STR STR STR STR STA 378 577 * = Test-specimen less than 10mg is not required to test according to EN71-3 1994 section 7. STR STR STR STA S75 STR STA STR STR STR STR STA *** * End of Page 4 of 7 * STA STR 75 STA 573 STA STA STR STR STR S7.3 STE STA SIB STR STA 9 STR STRSTA STR STR $ST\Xi$ STA STE STR STR STA STR 37E STR STR STR STR STR STR STR STR STR STT STR STE STR STA 57A STR STA STE 😓 🗁 Cogyright of this report is owned by the specialized Technology Resources (High Light and may not be reproduced other than in the militan approval of the issuing Company. Specialized Technology Resources (H.K.) Ltd.

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See Reverse For Terms And Condition Ranges 4 and 19 tiem Numbers: 61736 Specialized Technology Resources (H.K.) Ltd.

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STR STR STRAll goncentrations expressed in milligrams, per kilograms

STR STR ETAMethod for determination of each soluble element present STR STR STR a) Antimony, Arsenic, Barium, Cadmium, Chromium, Lead, Mercury and Selenium are determined by Inductively Coupled Plasma Spectroscopy.

STR Weight Lised were 0.0713, 0.0899, 0.0603, 0.0618, 0.0362, 0.0478, 0.0161, 0.0255, 0.0257, 0.0230, STR 0.0176, 0.0169, 0.0143, 0.0181, 0.0156, 0.0128, 0.0161, 0.0342, 0.0111, 0.0152 and 0.0996 gram per piece respectively.

Specialized Technology Resources (H.K.) Ltd. 16/F & 17/F., Tower B. Régent Centre, 63 Wo Yi Hop Road, Rwai Chung, N.T., H.K. Tel: (852) 2423 3092 Fax: (852) 2480 5436 See Reverse For Terms And Conditions 86 Service 19 STA

STR SIK SIH STR STR STR STR STR STA STR STR STA STR STR STR TEST REPORT STR STA STR STR STA STR STS STA CLIENTS!TA STR STR 57B 57.F S^{TB} STR S^TR STATHE CHENILLE KRAFT COMPANY TR STA REPORTING.STA T69904448 STA STA STA 65 Ambrogio Drive STGurnee IL 60031, STA STS STR STR STR STR \$78 STA DATE STA October 06, 1999 SUN.ACTA STA STA STA STH STA STA STA Page 7 of 7 STR STR STR STR STR STR STR STR STA STA STA STR STA STR TEST RESULTS STR STR STR STO STR STA STES. STR MICROBIOLOGICAL TESTER STR STR STR STA STA S78 STR STR STR STR STR STR STR STR STA STO STR STR STR STRSTF STR STR STR STR STBSTE < STE SE STotal Yeast Count STS STR $10\,\mathrm{cfu/g}^{-2}$ STR Total Mold count-STA 19-cfu/gsta SIR STR STR $1.07 \times 10^7 \text{ cfu/g}$ Bacillus Cereus STA STR STR 5 STE STR STR STR STR 973 STR "STR "Tellow "less than" Francis "Colony forming unit" 75 STR $ST\Xi$ STA STA STR STR STA STR STR STA STA STA STA STR STR STR STR STR STR STA STR STA STBĦ STA STR STA 979 57.9 STA STR $ST\Xi$ STR STE STR STA S STR 973 STR STA STE 377 STA STR STE STR STP STA 7.5 STR STF STA STR STR STR STR STA STA STA STR STA STA STR STA STA STR 7 3 STA STR STR 57.7 STR STR STR 7.5 STR 5 STR STA STR STA STA STR \$77E STR STA STR 5 STR S79 STA STA STE STR S STR STRSTR STA S STR STR STR STR STR STA STR - STP STR STR STR STR STR 🔾 Copyright of this report is owned by the Specialized Technology Resources (H.K.) Ltd. and may not be reproduced other than in full except with the written approval of the issuing Company.

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STR(T) REPORT NO.: T-982293 UPDATED

DATE: JAN. 14, 1999

QUALITY ASSURANCE TEST REPORT

Prepared For: The Chenille Kraft Company

P.O. Box 269, 65 Ambrogio Drive, Gurnee,

IL 60031

Attention of: Pat Mueller - National Sales Manager

Vendor: Borymax Industrial Co., Ltd.

10F-1, No.1, Kwang Fu S. Road,

Taipei, Taiwan, R.O.C.

Contact:

Ms. Lin

Tel / Fax

: 886-2-27632732 / 886-2-27636631

ITEMS TESTED:

Neon Glitter / Glitter Glue Pens / Neon Glitter Glue Pens / Curly Hair

The vendor supplied 12 samples for each item without the final package on Nov. 17, 1998, and the testing is authorized to proceed on Nov. 21, 1998. The final package for each item was submitted on Jan. 08, 1999.

Age Grading: 3 years and up

Date of initial tests conducted: Nov. 23 - 30, 1998

Date of tests conducted for the final package: Jan. 08 – 13, 1999

TESTS PERFORMED:

1.0 MECHANICAL SAFETY TESTING for all ages per 16 CFR, AND ASTM F963-96a

2.0 FLAMMABILITY EVALUATION

3.0 CHEMICAL ANALYSES

3.1 Heavy Metals Analysis - Glitter Glue / Neon Glitter Glue

3.2 CONEG Regulations on Packaging Material

4.0 LABELING REVIEW

SUMMARY OF TEST RESULTS:

{X} PASS

FAIL

REMARK: THE TEST RESULTS RELATE ONLY TO THE SAMPLES TESTED.

************** PAGE 1 OF 4 *******

FOR AND ON BEHALF OF STR (TAIWAN) LTD.

AUTHORIZED BY STR (TAIWAN) LTD.

NANCY LIU - CHEMIST

JANET CHO - QA MANAGER



STR(T) REPORT NO.: T-982293 UPDATED

DATE: JAN. 14, 1999

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TEST RESULTS

1.0 PHYSICAL/MECHANICAL TESTING:

1.1 DROP IMPACT TEST: ASTM F963, SEC. 8.7.1, 16 CFR 1500.51

CRITERIA: SHALL NOT HAVE POTENTIALLY HAZARDOUS SHARP POINTS, SHARP EDGES AND

SMALL PARTS AFTER TEN TIMES DROP ONTO A TILE COVERED CONCRETE FLOOR

FROMA HEIGHT OF 4.5 FEET.

RESULTS: ALL ITEMS PASSED THE SET REQUIREMENT.

1.2 TORQUE/TENSION TEST: ASTM F963 SEC. 8.8 / 8.9 / 16 CFR 1500.53

CRITERIA: SHALL NOT HAVE POTENTIALLY HAZARDOUS SHARP POINTS, SHARP EDGES AND

SMALL PARTS AFTER APPLYING A TORQUE OF FOUR INCH POUNDS FOR TEN SECONDS OR FROM APPLYING A PULLING FORCE OF FIFTEEN POUNDS FOR TEN

SECONDS.

RESULTS: ALL ITEMS PASSED THE SET REQUIREMENT.

1.3 SHARP EDGES: ASTM F963 SEC. 4.7 / 16 CFR 1500.49

CRITERIA: SHALL NOT HAVE ACCESSIBLE, POTENTIALLY HAZARDOUS SHARP EDGES.

RESULTS: ALL ITEMS PASSED THE SET REQUIREMENT.

1.4 SHARP POINTS: ASTM F963 4.8 / 16 CFR 1500.48

CRITERIA: SHALL NOT HAVE ACCESSIBLE, POTENTIALLY HAZARDOUS SHARP POINTS.

RESULTS: ALL ITEMS PASSED THE SET REQUIREMENT.

1.5 SMALL PARTS: ASTM F963 4.6 / 16 CFR 1501

CRITERIA: THERE SHALL BE NO ACCESSIBLE SMALL PARTS THAT COMPLETELY FIT INTO THE

SMALL PARTS CYLINDER, EITHER BEFORE OR AFTER USE AND ABUSE TESTING.

RESULTS: THE CAPS OF ALL NEON GLITTER CONTAINERS, GLITTER GLUE CONTAINERS, AND

NEON GLUE CONTAINERS ARE SMALL PARTS IN ORIGINAL STATE, THEREFORE THEY

ARE RECOMMENDED TO BE LABELED "NOT FOR CHILDREN UNDER 3 YEARS. THE PACKAGE WAS RECEIVED ON JAN. 08, 1999, AND THE AGE GRADING IS AS

RECOMMENDED.

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TEST RESULTS

2.0 FLAMMABILITY EVALUATION

CRITERIA: THE BURN RATE OF PRODUCT SHALL NOT EXCEED 0.1 INCH/SECOND WHEN TESTED IN ACCORDANCE WITH 16 CFR 1500.44.

RESULT : ALL ITEMS PASSED THE SET REQUIREMENT.

CURLY HAIR (4 COLORS) NEON GLITTER (CONTAINER) GLITTER GLUE PEN CONTAINER AVERAGE 0.058 IN./SEC. AVERAGE: 0.04 IN./SEC. ALL DID NOT IGNITE.

3.0 CHEMICAL ANALYSES

3.1 HEAVY METALS ANALYSIS

CRITERIA: THE SAMPLES SHALL MEET THE HEAVY METALS' LIMITS IN ACCORDANCE WITH ASTM F963-96a. THE TEST RESULTS AND LIMITS ARE LABELED IN PARTS PER

MILLION (PPM).

RESULTS:

ELEMENTS	LIMITS	GLITTER GLUE
TOTAL LEAD	600	<12.5
SOLUBLE LEAD	90	<3.0
SOLUBLE CADMIUM	75	< 1.0
SOLUBLE BARIUM	1000	<10.0
SOLUBLE CHROMIUM	60	<1.5
SOLUBLE MERCURY	60	<1.0
SOLUBLE ARSENIC	25	<2.0
SOLUBLE ANTIMONY	60	<3.0
SOLUBLE SELENIUM	500	<5.0
ELEMENTS	LIMITS	NEON GLITTER GLUE
ELEMENTS TOTAL LEAD	LIMITS 600	NEON GLITTER GLUE <12.5
TOTAL LEAD	600	<12.5
TOTAL LEAD SOLUBLE LEAD	600 90	<12.5 <3.0
TOTAL LEAD SOLUBLE LEAD SOLUBLE CADMIUM	600 90 75	<12.5 <3.0 1.1
TOTAL LEAD SOLUBLE LEAD SOLUBLE CADMIUM SOLUBLE BARIUM	600 90 75 1000	<12.5 <3.0 1.1 <10.0
TOTAL LEAD SOLUBLE LEAD SOLUBLE CADMIUM SOLUBLE BARIUM SOLUBLE CHROMIUM	600 90 75 1000 60	<12.5 <3.0 1.1 <10.0 <1.5
TOTAL LEAD SOLUBLE LEAD SOLUBLE CADMIUM SOLUBLE BARIUM SOLUBLE CHROMIUM SOLUBLE MERCURY	600 90 75 1000 60 60	<12.5 <3.0 1.1 <10.0 <1.5 <1.0

NOTE: PPM = PARTS PER MILLION

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TEST RESULTS

3.2 CONEG REGULATIONS ON PACKAGING MATERIAL (CARTON)

CRITERIA: ALL PACKAGING MATERIALS SHALL COMPLY WITH THE CONEG REQUIREMENTS
THAT ALL PACKAGING OR PACKAGING COMPONENTS HAVE LESS THAN OR EQUAL
TO 100 PPM TOTAL CONCENTRATION OF LEAD, MERCURY. CADMIUM, AND
HEXAVALENT CHROMIUM. THE LIMITS AND RESULTS ARE LABELED IN PARTS PER
MILLION (PPM).

RESULTS:

KEYS TO SAMPLES:

SAMPLE 1 – PACKAGE (COLOR CARD) FOR NEON GLITTER SAMPLE 2 – PACKAGE (COLOR CARD) FOR GLITTER GLUE PENS

SAMPLE 3 - PACKAGE (COLOR CARD) FOR CURLY HAIR

ELEMENTS	LIMITS	SAMPLE 1	SAMPLE 2	SAMPLE 3
LEAD (Pb)	100	<12.5	<12.5	<12.5
MERCURY (Hg)	100	<5.0	<5.0	<5.0
CADMIUM (Cd)	100	8.5	11.5	12.3
HEXAVALENT CHROMIUM (Cr)	100	<7.5	21.5	<7.5
Pb + Hg + Cd + Cr	100	<33.5	<50.5	<37.3

Note: "<" means "less than".

4.0 LABELING REVIEW:

CRITERIA: PRODUCER'S OR DISTRIBUTOR'S NAME AND ADDRESS WITH THE COUNTRY OF ORIGIN SHOULD BE PRESENT ON THE PRODUCT OR ON THE PACKAGE. THE PRODUCT SHALL MEET ALL LABELED CLAIMS.

RESULT : DISTRIBUTOR'S NAME AND ADDRESS ARE PRESENT ON THE PACKAGE, AS WELL AS THE COUNTRY OF ORIGIN. ALSO, THE AGE GRADING IS PRESENT ON THE PACKAGE; ALL ITEMS ARE LABELED FOR 3 YEARS AND UP.

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