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## ART MATERIAL CERTIFICATION, ASTM D-4236

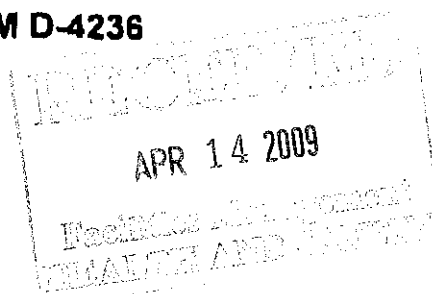
May 3, 1998

Project Number: 13086.0010

Producer: Chenille Kraft Company

Product Item: Chenille Stems (10 colors)

Item Number: 7112.01



### Notice:

This certification report consists of three (3) pages and is valid only as written and embossed. This certification report, or copies of it, if altered in any manner including omissions or deletions is not valid and will not be authenticated by me.

### Regulatory Background:

The American Society for Testing and Materials (ASTM) practice D-4236-88 as incorporated into 16 CFR Part 1500.14 (b)(8)(i)(B)(11) defines a toxicologist as "an individual who through education, training, and experience has expertise in the field of toxicology, as it relates to human exposure, and is either a toxicologist or physician certified by a nationally recognized certification board." These regulations require that, "The producer or repackager shall submit art material product formulation(s) or reformulation(s) to a toxicologist for review, such review be in accordance with paragraph (b)(8)(1)(D)" of 16 CFR 1500.14.

In evaluating the chronic hazard of the art material, the toxicologist is to take into account: 1) the chemical composition of the art material, 2) the scientific knowledge of each component and the total formulation, 3) the physical and chemical form of the product, bioavailability, concentration, and the amount of each potentially chronic toxic component in the formulation, 4) reasonable foreseeable uses of the art material product as determined by consultation with teachers, and other individuals who are experienced in use of the material(s), 5) potential for known synergism and antagonism of the various components in the formulation, 6) potentially chronic adverse health effects of decomposition or combustion products, if known, from any reasonably foreseeable use of the hazardous art material product, and 7) opinions of various regulatory agencies and scientific bodies concerning the components and the product. Based upon the conclusions reached as conformance with review determinations the toxicologist(s) shall recommend precautionary labeling that is consistent with that set forth by the standard.

Vendor # 017987 V-Part # =

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#### Review:

For this certification, I reviewed documents from Chenille Kraft Company, Taiwan Toy Manufacturers Association, pertaining to the ingredients and formulations of pipe stems made into rods about 12 inches x 4 mm each. The stems are in 10 colors (appearing to be black, blue green, brown, neon green, orange, pink, red, violet, yellow, and white)

I searched scientific literature and data banks for information pertaining to the potential chronic hazards of the ingredients as presented to me. These included federal and state sources of information, such as the Registry of Toxic Effects of Chemicals, listings of ingredients approved for use by the United States Food and Drug Administration, and other reference sources including Sax's Dangerous Properties of Industrial Materials, 8th Edition.

#### Evaluation:

In evaluating the chronic hazards of art materials, I used the procedures and criteria contained in 16 CFR 1500.135 as published in the Federal Register dated Friday, October 9, 1992 and entitled "Part II. Consumer Product Safety Commission. 16 CFR Part 1500 Labeling requirements for Art Materials Presenting Chronic Hazards; Guidelines for Determining Chronic toxicity of Products Subject to the FHSA; Supplementary Definition of "Toxic" Under the Federal Hazardous substances Act; Final Rules."

#### Findings:

None.

#### Recommendations:

None.

#### Certification:

As a qualified toxicologist, defined above, I certify that the Chenille Stems, item number 7112.01, made by Chenille Kraft Company in the colors of black, blue green, brown, neon green, orange, pink, red, violet, yellow, and white comply with ASTM standard D-4236-88, as incorporated into regulation and contained in 16 CFR 1500.14, for the Labeling of Art Materials for Chronic Health Hazards. The products may be labeled as follows:

CONFIRMS TO ASTM PRACTICE D-4236

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This certification is valid for 5 years from the date of this report, provided that the products' ingredients, formulations, and uses do not change during that period.

**Limitations:**

It is a legal responsibility of the producer or repackager of art materials to provide complete and accurate information about the ingredients and formulations of their art materials to the certifying toxicologist. For this certification, I relied on the information provided by

the Taiwan Toy Manufacturers Association, and by Chenille Kraft Company as constituting a complete and accurate description of the ingredients and formulations of the products being certified. If the information that is provided does not constitute such a description, this certification is invalid.

Changes in the intended uses of the products or changes in the ingredients or formulations are not covered by this certification. Changes in the products or the intended uses thereof will necessitate reevaluation and recertification of the products.

  
James R. Beall, Ph.D., DABT  
Certifying Toxicologist

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