

MASTER
2003MSDS
C2FWILLOWCHAR

SPECIALISTS IN
PUBLIC HEALTH

Environmental Medicine
I N C O R P O R A T E D

August 8, 2003

263 CENTER AVENUE
WESTWOOD, NJ 07675
(201) 666-7929
FAX: (201) 666-8119

MS. MARY LI
PRODUCT MANAGER
C2F INC
6600 SW 111TH AVENUE
BEAVERTON, OR 97008

REGARDING: Art Material Certification (ASTM-D4236)
For: **C2F - WILLOW CHARCOAL STICKS**

Dear **MS. LI**:

This letter constitutes my certification that your product,
C2F - WILLOW CHARCOAL STICKS
complies with the standard cited above. As a qualified
Toxicologist as defined by ASTM D-4236, I confirm compliance
of this product with the American Society for Testing and
Materials (ASTM) Standard of Practice for Labeling Art
Materials for Chronic Health Hazards. I conducted this
review in a manner consistent with the Consumer Product Safety
Commission Guidelines as found in 16 CFR 1500.135. The
procedures and regulations that I followed are described
separately and have been filed with the CPSC.


This certification is based on the product(s) with changes
to your current label, as required. To comply with LHAMA and to
complete my review, I considered the product as a whole. I
reviewed the components, their formulas, the MSDS's for the
ingredients, and such other information provided to me by you.

If any of the formulas or intended uses change, it will be
necessary for me to evaluate the new data in order for my
certification to remain applicable. In any case, under ASTM
requirements, this certification must be reviewed every five
(5) years. This certification is not transferrable.

Be advised that the Consumer Product Safety Commission may
choose a different determination about this product line than
I made. Since the Commission is mandated by Congress to enforce
LHAMA, their opinion, not mine, is final.

Sincerely,

ENVIRONMENTAL MEDICINE INC.,


Rudolph J. Jaeger, Ph.D., DABT, REA (California)
Certifying Toxicologist

WWW.ENVMED.COM

C2F - WILLOW CHARCOAL STICKS

The Federal Hazardous Substances Act (FHSA), as amended by Public Law 100-695 (15 USC 1227), names the American Society for Testing and Materials (ASTM) Standard Practice for Labeling Art Materials for Chronic Health Hazards, Designation 4236, as applicable under federal law, to art materials. This US Federal requirement applies in addition to the labeling and certification requirements of various states. The referenced ASTM standard previously established certain procedures which are to be used by qualified persons to use in health labeling review and compliance certification for art materials. The statement of compliance with the standard can only be performed by a Toxicologist or a Physician who is certified by a nationally recognized certification board. For ASTM, the Toxicologist shall use the current ASTM standard practice, while FHSA requires ASTM D4236-88. This certification is conducted in accord with the Consumer Product Safety Commission procedure detailed at 16 CFR 1500.135 as applicable and as data are available.

For the Toxicologist to assure labeling compliance as required by ASTM and to conclude that a material is suitable for use, i.e., to certify a material as being free of chronic health hazards or that it is adequately labeled to warn of such hazards under conditions of use, the Toxicologist shall conduct those investigations which, in the Toxicologist's professional opinion, are sufficient to develop the information required for such a judgment. These investigations include manufacturing formula review, biologic testing (as warranted), and review of the toxicologic literature. Biologic availability and anticipated exposures, as well as acceptable levels of intake, are considerations used by the Toxicologist in his or her evaluation. Incorporated by reference are the determination of the presence of substances which may be carcinogenic, neurotoxic or otherwise toxic to the reproductive system of men, women and children. Proper Labeling considers the assessment of exposure by ingestion, inhalation and dermal contact. As data are available, direct monitoring, modeling or surrogate data may be used. Assessment of bioavailability and the application of suitable margins of safety are an integral part of this evaluation.

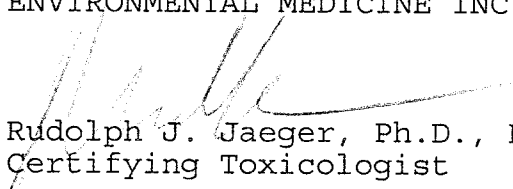
In the present case, the general formula for your product was reviewed by Dr. Rudolph J. Jaeger, Consulting Toxicologist. Dr. Jaeger is a Diplomate of the American Board of Toxicology. As defined by ASTM, a Toxicologist is qualified by training and experience to evaluate the toxicity of art materials. The product in question has been evaluated for its intended use as an art or craft material. To fill a gap in information or to confirm the data provided, the Toxicologist may arrange for the performance of toxicity testing. Test results from similar products, certification for equivalent product and information provided by the supplier of the components used, will also be judged to be applicable. Exposures which are foreseeable and reasonable form the basis for the certification. For, reasonable and foreseeable uses of the product, that is, its intended and likely use as an art material, the Toxicologist will

rely on the label as well as the statements of the manufacturer, formulator, or the packager.

Your representative(s), employees, and others assigned by you have described the product(s), the intended distribution, and expected uses. The description of the art material, as of this date, suggests that the material is generally available for sale to a variety of customers. It is understood that similar products or formulations have been sold by your firm. To the present date and for the product that is named below, the Toxicologist is given to understand that no significant chronic harm or contents-attributable injury has been reported to you by customers or by other responsible authorities. As the manufacturer, such reports must be provided to the Toxicologist for review if and when they are received. The product labels will be registered with a Poison Information System so that reports of adverse effects can be documented.

Based on professional judgment, scientific and regulatory literature, and the reasonably foreseeable use of the products, it is judged that the product meets the current ASTM D4236 requirements and, thus, it may be certified for compliance. This product, **C2F - WILLOW CHARCOAL STICKS** may be labeled as follows: "CONFORMS TO ASTM D-4236".

ENVIRONMENTAL MEDICINE INC.



Rudolph J. Jaeger, Ph.D., DABT
Certifying Toxicologist

C2F - WILLOW CHARCOAL STICKS

This product may bear the following seal:

APPROVED PRODUCT

EXPLANATION OF SEAL STATEMENTS**HEALTH AND SAFETY LABEL**

Products bearing the HEALTH and SAFETY seal are judged by the certifying Toxicologist to present a health or safety risk to the consumer. They are TOXIC under law and therefore, pre-cautionary health and safety labeling is required by applicable statute. This determination is based on information and testing provided by the manufacturer. It consists of the formula, ingredient MSDS's, prior product/marketplace experience and other independent data. This seal notifies the customer that pre-cautionary health and safety statements are required to conform to ASTM D-4236 and LHAMA.

CERTIFIED PRODUCT NONTOXIC

Products in this class have been laboratory tested and are determined to be NONTOXIC as defined by the Federal Hazardous Substances Act and LHAMA. No health labeling of any kind is required. These materials, in the opinion of the Toxicologist, may be used by children (ages three and above), and other sensitive groups such as the elderly and the infirm. In the opinion of the Toxicologist, the product's form, container and/or limited biologic availability make it unlikely to pose a human health risk when used. This seal signifies to the consumer that the product conforms to ASTM D-4236 and LHAMA.

APPROVED PRODUCT

Products labeled APPROVED PRODUCT are NOT laboratory tested for toxicity. However, using generally prevailing scientific standards and chemical methods, these products are judged to be NONTOXIC by formula review. As such, the Toxicologist's determination derives from the individual ingredients, the manufacturer's prior marketplace experience, and other applicable independent data. Since these products are unlikely to pose a human health risk when used as intended, labeling may not be required. However, the use of the product and its availability to consumers, e.g. children, may be regulated by advisory labeling which is added at the option of the toxicologist and the manufacturer. The presence of the Approved Product seal signifies to the consumer that the label and the product conform to ASTM D-4236 and LHAMA.

August 8, 2003

Ms. Mary Toro,
Office of Compliance
Division of Regulatory Management
Consumer Product Safety Commission
Washington, DC 20207

Dear Ms. Toro,

Kindly accept Art Material Certification paperwork for the following company and its product line:

C2F INC
C2F - WILLOW CHARCOAL STICKS

Contact us if you need any additional information.

Sincerely yours,

ENVIRONMENTAL MEDICINE INC.

Ernest J. Hoitsma
Art Material Coordinator

August 8, 2003

MS. BETTY BLAZER
PRODUCT DATA
MICROMEDEX, INC.
6200 South Syracuse Way, Suite 300
Englewood, CO 80111-4740

ATT: Data Acquisition Office

Dear Ms. Blazer,

Please accept Poisindex Information forms for the following company
and its products:

C2F INC
C2F - WILLOW CHARCOAL STICKS

Kindly confirm receipt of this information in your usual manner.

Sincerely yours,

ENVIRONMENTAL MEDICINE INC.

Ernest J. Hoitsma
Art Material Coordinator

Company Code No... 03-098 TPY
 Brand/Product Name C2F - WILLOW CHARCOAL STICKS
 Product Color Name CHARCOAL BLACK
 Use/Application... ART MATERIAL
 Product Sizes VARIOUS Catalog Number.....N/A
 Number of Colors...1 UPC Number.....N/A
 State (pH if Liq.) N/A SKU Code.....N/A
 Viscosity.....N/A Formula Number.....N/A
 Flashpoint.....N/A Industrial Use (Y/N) NO
 Formula Date.....2002 Consumer Use (Y/N)...YES
 Entry into Market..2002 Children's Use (Y/N).YES

COMPANY NAME C2F INC
 NO./STREET/CITY 6600 SW 111TH AVENUE BEAVERTON
 STATE/ZIP/COUNTRY OR 97008 USA TEL: 503-643-9050

TOXICITY INFORMATION: CALL DR. R. J. JAEGER 1-201-666-7929 OR 1-800-468-6942

| <u>CHEMICAL INGREDIENTS</u> | | <u>C.A.S. IDENTIFICATION</u> | |
|-----------------------------|------------------------|------------------------------|-------------------|
| | <u>CHARCOAL BLACK</u> | <u>NUMBER OR C.I. NUMBER</u> | <u>PERCENTAGE</u> |
| 1 | WILLOW CHARCOAL STICKS | NO ISSUES | <100.00 |
| 2 | | | < |
| 3 | | | < |
| 4 | | | < |
| 5 | | | < |
| 6 | | | < |
| 7 | | | < |
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| 24 | | | < |

Company Code: 03-098 Formulation:
Product Identity: C2F - WILLOW CHARCOAL STICKS
Product Color: CHARCOAL BLACK SD
PH N/A Viscosity N/A Flashpoint N/A

F R O N T P A N E L

SIGNAL WORD.. (NONE)

PRINCIPAL
HAZARDS (NONE)

REFER: (NONE)

-----B A C K AND/OR S I D E P A N E L-----
HAZARDOUS
INGREDIENTS (NONE)

HAZARD
STATEMENT (NONE)

PRECAUTION
STATEMENT (NONE)

CHILDREN'S
STATEMENT (NONE)

FIRST AID
STATEMENTS (NONE)

REQUIRED
STATEMENTS CONFORMS TO ASTM D4236

CALIFORNIA: (NONE)

SEAL
STATEMENT APPROVED PRODUCT