ALUFOIL PRODUCTS CO., INC.



135 OSER AVENUE, SUITE 3 HAUPPAUGE, NEW YORK 11788 TELEPHONE: 631-231-4141

FAX PHONE: 631-231-1435 INTERNET: www.alufoil.com

February 23, 2009

Mr. Paul Bojalad Kurtz Brothers Inc. 400 Reed Street, PO Box 392 Clearfield, PA 16830-0392

Subject: CPSIA Requirements

Dear Paul,

We do not fully understand what is (will be required) to meet the Consumer Product Safety Commission requirements with regard to products that are to be used by children.

Firstly, Alufoil does not market any of our products to children.

In the event that any of our products are used by children we have attempted to source applicable standards and specifications that might apply to our products and have listed them below and have included documents that might be helpful.

- 1. We certify that the Aluminum Foil that we provide, is in compliance with current CONEG and RoHS guidelines with regards to the acceptable limits of the following materials: Lead, Mercury, Cadmium, Hexavalent Chromium, Polybrominated Biphenyls and Polybrominated Diphenyl Ethers. Additionally, this material is within acceptable levels with regards to Halogens donors (Fluorine, Chlorine, Bromine, Iodine and Astatine) and other restricted elements (including Antimony, Arsenic, Barium & Selenium). Furthermore, there are no materials from the California Proposition 65 list of chemicals present at levels that would require a warning statement.
- 2. We further certify that, in cases where the regulated materials are present within acceptable levels, that these materials were not intentionally added during the manufacturing process.
- 3. The component parts of the material that we supply to you consist of the following:
 - a. Paper or Paperboard
 - b. Aluminum Foil (see enclosed U.S. Federal Specification QQ-A-1876). Please note that the U.S. Food and Drug Administration

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requires that certain samples submitted for testing be wrapped in aluminum foil and that aluminum foil is considered safe and free of unacceptable substances.

- c. Inc or color coating (see enclosed letter from INX)
- 4. Note that all of the component parts of the material that you we supply you meet the 100 ppm maximum limit as specified in the Coalition of North Eastern Governors Model Toxics Legislation.

We will provide more information, test data, etc. as the requirements are clarified.

Sincerely,

Howard Lent, President Alufoil Products Co., Inc.

HL/ms Encls

INCH-POUND

NOTICE OF VALIDATION

QQ-A-1876 NOTICE 1 16 August 1990

PEDERAL SPECIFICATION

ALUMINUM FOIL

QQ-A-1876, dated 29 July 1974, has been reviewed and determined to be valid for use in acquisition.

Custodians:

Army - MR Navy - AS

Air Force - 84

Preparing activity: Army - MR

3. REQUIREMENTS

3.1 Chemical composition.

- 3.1.1 Grade A. Grade A foil shall be produced from material of not less than 98.6 percent aluminum content, and shall contain less than 0.01 percent each of lead, ersenic, or cadmium.
- 3.1.2 Grade B. Grade B foil shall be produced from material of not less than 99.00 percent aluminum content.
- 3.2 Temper. Foil shall be in the annealed temper. In addition, for Grade A foil the flexibility and strength characteristics shall be such as to permit the folding and shaping ordinarily encountered in manual and machine packaging operations and in food processing and handling without damage to the foil.

3.3 Surface finish.

- 3.3.1 Grade A. Grade A foil shall have a slightly slick finish.
- 3.3.2 <u>Grade B.</u> Grade B foil shall be furnished with either a dry-ennealed finish or a slick-annealed finish, as specified by the procuring agancy (see 6.2).
- 3.4 Thickness and covering area. The thickness of plain foil (not interleaved) shall be as shown in table I. The resulting covering area is also shown.

Table I. Foil thickness and covering area.

Foil thickness, inch	Covering area, sq. in. per pound
0,00025	41,000
.0003	34,200
.00035	29,300
0004	25,600
.0005	20,500
.00065	15,800
.0007	14,600
.0008	12,800
.0010	10,250
.0015	6,330
,000,1	5,2.70
.UC30	3,420
. (4)20	2.560
.cc.+∪	2,450

Receive Area erects as the many appropriate to the second expension and the



Kevin G. Facktath Director, Regulatory Affairs in A International Ink Co. 150 N. Martingale Suits 700 Schaumburg, it. 60173 630-382-1859 Phone 847-517-1652 FAX Kevin. Facklam@inxintl.com www.inxinternational.com

January 30, 2009

Ryon Macey FOIL LAMINATING, INC. 1000 PIDCO DR PLYMOUTH, IN 46563

RE: Consumer Product Safety Improvement Act (CPSIA) of 2008 - Lead Standard

Dear Mr. Macey,

INX INTERNATIONAL INK CO complies with federal and international standards for lead and other heavy metal content concerning high toxicity metals; such as cadmium, hexavalent chromium, and mercury that are listed hereunder. Additionally, INX takes a very proactive position with its suppliers of pigments and other chemical raw materials that potentially could become contaminated with these substances. Specifically, suppliers of these materials certify that their products comply with these applicable standards for which they are supplying, both through their independent analysis and with their company certification. Additionally, INX has taken the additional proactive measure to verify these certifications and independent analysis are valid by having our own independent third party analysis performed on their materials. INX will communicate any non-conformances of these standards if that ever should happen.

CONEG (Coalition of North Eastern Governors Model Toxics Legislation) / TPCH (Toxics in Packaging Clearinghouse) The products supplied by INX International Ink Co. (INX) are formulated from ingredients whose chemistry excludes cadmium, hexavalent chromium, lead, and mercury. However, like all synthetic and naturally occurring chemical substances, raw materials as received from our suppliers may conceivably contain trace amounts of these metals. INX does not intentionally add these heavy metals to any of its ink products, and therefore INX complies with that portion of the legislation prohibiting the use of such metals. Based on random tests of ink products produced by INX in the last two years and results of investigation or review of the information as provided by our suppliers, we can therefore certify that any such metals that are incidentally present in our ink products meet the 100 ppm maximum limit as specified in the CONEG toxics model legislation.

Consumer Product Safety Improvement Act (CPSIA) of 2008 - Lead Standard

The CPSIA of 2008 specifically excludes printing inks that become part of the substrate, as dictated in the regulation 16 CFR 1303, shown below with emphasis added:

§ 1303.2 Definitions.

- (a) The definitions in section 3 of the Consumer Product Safety Act (15 U.S.C. 2052) shall apply to this part 1303.
- (b) For purposes of this part:
- (1) Paint and other similar surface-coating materials means a fluid, semi-fluid, or other material, with or without a suspension of finely divided coloring matter, which changes to a solid film when a thin layer is applied to a metal, wood, stone, paper, leather, cloth, plastic, or other surface. This term does not include printing inks or those materials which

Headquartered in Schaumburg, Illinois INX International Ink Co. is the third largest producer of ink in North America and a global supplier as part of Sakata INX worldwide operations. We are an industry leader offering a full line of ink and coating solutions technology for packaging and commercial print applications. Our products solutions focus on metal decorating, flexographic, gravure, web offset, lamination, corrugated, sheetfed, inkjet and UV/EB inks and coatings.