

Firm: 0698 3221,3262 Hydro Air
Ind (spa/pool covers), Off(6a6b
release), Off(Part Denial) Ex. 3, 4,
5, 7(E), chron, spec 3285

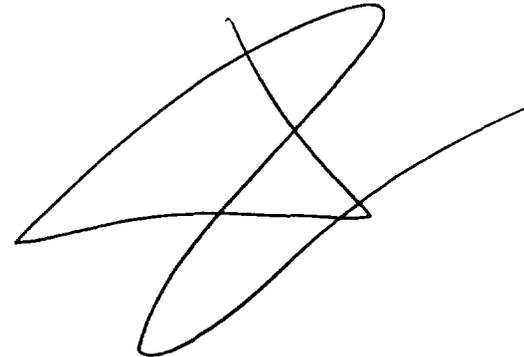


U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

August 26, 1998

CERTIFIED MAIL

Sam Cristy, Editor
Product Safety Letter
Washington Business Information, Inc.
1117 North 19th Street, Suite 200
Arlington, VA 22209-1798



Re: FOIA Request S-804036: Recall file pertaining to Hydro-Air Industries drain covers for spas and pools

Dear Mr. Cristy:

This responds to your Freedom of Information Act (FOIA request seeking information from the Consumer Product Safety Commission. The records from the Commission files responsive to your request have been processed and copies of the releasable records are enclosed.

The enclosed records include file information generated by the Commission itself or its contractors for regulatory or enforcement purposes. These records are memoranda and other correspondence, notes and documents. The Commission has established management systems under which supervisors are responsible for reviewing the work of their employees or contractors. The file information materials are final and have been prepared and accepted by the Commission's staff under such review systems. The Commission believes that it has taken reasonable steps to assure the accuracy of the information.

We must withhold other records responsive to your request pursuant to Exemptions 3 and 4, 5 U.S.C. §§ 552(b)(3) and (b)(4), and section 6(a)(2) of the Consumer Product Safety Act (CPSA), 15 U.S.C. §§ 2055(a)(2). FOIA Exemption 3 provides for the withholding from disclosure of matters that are specifically exempted from disclosure by another statute. Section 6(a)(2) prohibits the Commission from disclosing information that is exempt from disclosure under Exemption 4 of the FOIA. That exemption protects trade secrets and confidential commercial information directly related to a firm's business that the firm has not made public and whose disclosure could give a substantial commercial advantage to a competitor. Specifically, we are withholding portions that if disclosed would reveal confidential financial and business relationships, sales figures and customers.

With respect to the above, we are withholding documents at the following pages: 15; 18; 19-21; 32; 34; 35-36; 38; 71 148-152; and 153-160.

We are also withholding pages 48-53 because those pages are not responsive to your request.

Finally, we must withhold portions of the law enforcement investigatory files pursuant to Exemptions 5 and 7 (E) of the FOIA, 5 U.S.C. § § 552 (b) (5) and (b) (7) (E). Exemption 5 provides for the withholding from disclosure of inter-agency and intra-agency memoranda which would not be available by law to a party in litigation with the agency. FOIA Exemption 7 (E) provides for the withholding from disclosure records or information compiled for law enforcement purposes, to the extent that the production of such law enforcement records or information would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law.

The records being withheld consist of internal notes and memoranda containing recommendations, opinion, suggestions and analyses of the Commission's technical and legal staffs. The records constitute both predecisional and deliberative discussion that clearly falls within the attorney-client and attorney-work product privileges. Any factual materials in the records not covered by some other exemption are inextricably intertwined with exempt materials or the disclosure of the factual materials would itself expose the deliberative process. We have determined that the disclosure of these certain law enforcement investigatory records responsive to your request would be contrary to the public interest. It would not be in the public interest to disclose these material because disclosure would: (1) impair the frank exchange of views necessary with respect to such matters, and (2) reveal the techniques, guidelines and strategies utilized by the investigative and legal staff in developing the information regarding this investigation and other on-going investigations, which if disclosed would significantly risk circumvention of the statutes and regulations of the Commission administrators.

According to the Commission's regulations implementing the FOIA at 16 C.F.R. § 1015.7, a partial denial of access to records may be appealed to the General Counsel of the Commission within thirty (30) days of your receipt of this letter. An appeal must be in writing and addressed to: FOIA APPEAL, General Counsel, ATTN: Office of the Secretary, U.S. Consumer Product Safety Commission, Washington, D. C. 20207.

Mr. Cristy, S804036

Page 3

Processing this request, performing the file searches and preparing the information cost the Commission \$80.00. In this instance we waived all of the charges. Thank you for your interest in consumer product safety. Should you have any question, please contact Alberta Mills, Paralegal Specialist, by letter, facsimile (301) 504-0127 or by telephone (301) 504-0785, ext. 1299.

Sincerely,

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

enclosures

News from CPSC

PP940116

U.S. Consumer Product Safety Commission

Office of Information and Public Affairs

Washington, D.C. 20207

For Immediate Release
February 3, 1997
Release # 97-065

Contact: Rick Frost
(301) 504-0580 Ext. 1166

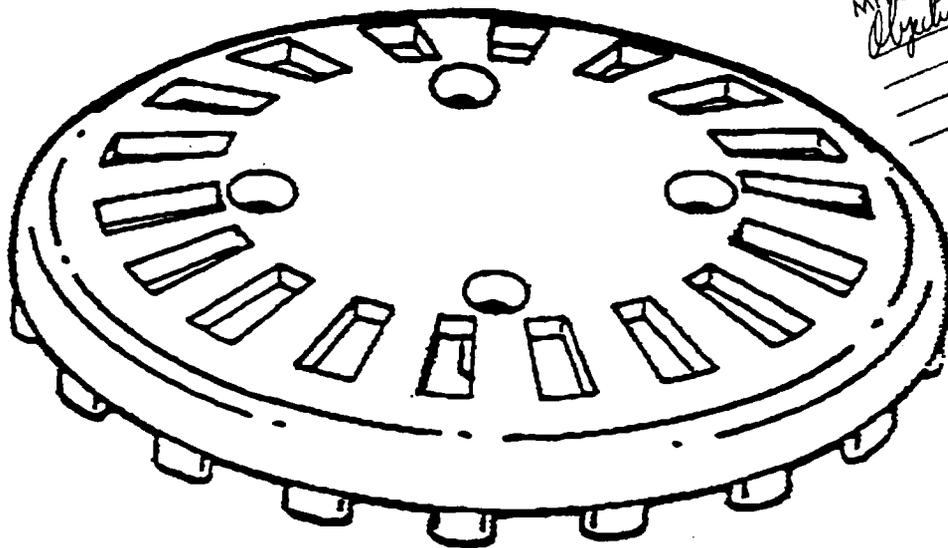
CPSC and Hydro-Air Industries Recall Main Drain Covers in Spas, Hot Tubs, and Swimming Pools

WASHINGTON, D.C. - In cooperation with the U.S. Consumer Product Safety Commission (CPSC), Hydro-Air Industries of Orange, Calif., is recalling about 206,000 (model 10-6200) main drain covers in spas, hot tubs, and swimming pools.

Hydro-Air's model 10-6200 drain cover is designed to cover pipes carrying water out of spas, hot tubs, and swimming pools. Under certain circumstances, a bather's head can be held under water if the bather's hair becomes entangled in the drain cover as the water and hair are drawn through the drain.

Hydro-Air is aware of two drownings and one near drowning resulting from hair getting trapped in the drain cover.

MFR/PRVLR NOTIFIED
Objectives granted in part
Comments attached
Excisions/Revisions
Firm has not received further notice
Jan P/26/98



Hydro-Air's model 10-6200 drain cover is a white circular plastic disc, measuring 6 inches in diameter with 18 rectangular openings on top. Each rectangular opening measures 3/4 inch long by 5/16 inch wide. "Hydro Air P/N 10-6200" is imprinted on the top of the cover. This drain cover was installed in spas, hot tubs, and swimming pools from 1980 to 1995.

1

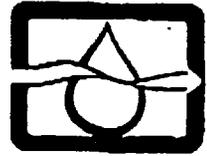
Consumers should inspect their spas, hot tubs, and swimming pools to determine if the model 10-6200 drain cover is installed. If so, consumers should immediately stop using their spas, hot tubs, and pools and contact Hydro-Air at (800) 230-9560 to receive a free replacement part. Swimming pool owners can contact Hydro-Air at (800) 230-9560 for guidance in the inspection process.

Consumers should not use their spas, hot tubs, and swimming pools until the replacement part has been installed. If consumers choose to use their spas, hot tubs, and pools before the replacement part is installed, consumers should use extreme caution and follow these precautions:

- Keep long hair away from the main drain cover. Wear a bathing cap or pin hair up.
- Never allow a child to play in a way that could permit the child's hair to come near the main drain cover. Always supervise children around a spa, hot tub, or swimming pool.
- If the main drain cover is missing or broken, shut down the spa, hot tub, or swimming pool until the cover is replaced.
- Know where the cut-off switch for the pump is located, so that you can turn it off in an emergency.



HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA 92865 • 714/974-1920 • FAX 714/974-5371

DATE: 2/3/98 FROM: DAVE ALLEN

ATTENTION: TINA ASHROYA AT CPSC, COMPLIANCE

Number of Pages (Including this cover sheet) 2

MESSAGE:

PROGRESS REPORT FOR CASE # CP 90116



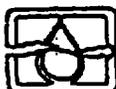
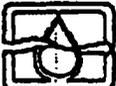
FOLLOWS.



BEST REGARDS



DAVE A.



Monthly Progress Report for Corrective Action Plan

CASE #: RP 940116 Compliance Officer: JUDY HAYES
 Company Name: HYDRO AIR IND. Product: 10-6200
 Reporting Dates, From: 1/1/92 To: 1/22/98 Total # of Affected Products: _____

I) PRODUCTS CORRECTED/CAPTURED BY YOUR FIRM:

Location of Products	Total Products	Corrections This Period	Total Corrections	Percentage Corrected
with Manufacturer	_____	_____	<u>10,968</u>	_____
with Distributor	_____	_____	_____	_____
with Retailers	_____	_____	_____	_____
with Consumers	_____	_____	_____	_____
TOTAL:	_____	_____	_____	_____

II) NOTIFICATION MEASURES: (Using the categories listed below, record the number of notifications attempted by your firm during this reporting period, and record the total number of notifications to date.)

	Number for This Reporting Period	Total
Billing Insert	_____	_____
Direct Mail Letter	_____	<u>1200</u>
Magazine	_____	<u>6</u>
Newspaper	_____	_____
Pediatrician Poster	_____	_____
Phone Call	_____	_____
Product Catalog	_____	_____
Radio	_____	_____
Retail Store Poster	_____	_____
Television	_____	_____
Video News Release	_____	_____
Web Site	_____	_____
Other/Unknown	_____	_____

III) CONSUMER AWARENESS: (Using the categories below, record the way, by numerical quantity, consumers told you they learned of the corrective action, i.e. consumer received direct mail, read magazine, etc.)

	Number for This Reporting Period	Total
Billing Insert	_____	_____
Direct Mail Letter	_____	_____
Magazine	_____	_____
Newspaper	_____	_____
Pediatrician Poster	_____	_____
Phone Call	_____	_____
Product Catalog	_____	_____
Radio	_____	_____
Retail Store Poster	_____	_____
Television	_____	_____
Video News Release	_____	_____
Web Site Hits	_____	_____
Other/Unknown	_____	_____

IV) Calls to 800 Number/Correspondence

	# From Customers This Reporting Period	Total
800 Number	_____	<u>2439</u>
E-mail	_____	<u>0</u>
Written Requests	_____	<u>0</u>

NOTE: Submit completed form by the **FIRST** of EACH MONTH to Tina Adekoya at: United States Consumer Product Safety Commission, Office of Compliance 4330 East West Highway, Room 613 Bethesda, MD 20814
 OR, fax report to (301) 504-0359. Address any questions to Ms. Adekoya at (301) 504-0608, extension 1223

4



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

Tel: 301-504-0608

DIVISION OF
CORRECTIVE ACTIONS

FAX: 301-504-0359

DATE: 12/29/97 PAGES TRANSMITTED 2 + cover

TO: Dave Allen

TITLE: VP Manufacturing

OFFICE: _____

FAX #: 714 974-5371

FROM: Lina Adeyeye

REMARKS: Needs immediate Action

Confirmation copy to follow by U.S. Mail

Fax Transmission Only

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. MAIL.

5



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE

Division of Corrective Actions

Tina Adeyeye
Recall Coordinator
Tel: 301-504-0608 Ext. 1223
Fax: 301-504-0359

December 29, 1997

Fax Only

Dave Allen
Vice President Manufacturing
Hydro Air Industries, Inc.
1317 West Grove Avenue
Orange, CA 92665

Re: RP940116 - Suction Fitting.

Dear Mr. Allen:

By letter dated April 14, 1997, the Division of Corrective Actions staff notified you that the staff has accepted the Corrective Action Plan (CAP) for the above-cited file and will monitor the plan's effectiveness. The staff requested that the firm send this office monthly progress reports on the CAP on the first of each month.

Our records indicate that the firm has not submitted any progress reports for this CAP. Please provide a progress report indicating the current status of this corrective action plan within ten business days of your receipt of this letter, and submit monthly reports thereafter. You may send the reports by mail to my attention at the above address or telefax them to me at: (301) 504-0359.

I am enclosing a blank progress report form for your convenience. Thank you for your cooperation.

Sincerely,

Tina Adeyeye
Recall Coordinator

Enclosures

6

MODE = MEMORY TRANSMISSION

START=DEC-29 14:04

END=DEC-29 14:06

FILE NO. = 088

STN NO.	COM	ABBR NO.	STATION NAME/TEL.NO.	PAGES	DURATION
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-CPSC COMPLIANCE -

***** -301 504 0359 - ***** - 301 504 0359- *****



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

DIVISION OF
CORRECTIVE ACTIONS
FAX: 301-504-0359

Tel: 301-504-0508

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17

2074016

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE, ORANGE, CA. 92665 ■ 714/974-1920

97 MAY 28 13 54

CHOC

May 23, 1997

Judith Hayes
Consumer Product Safety Commission
4330 East West Highway
Bethesda, Md. 20814-4408

Re: Update on Advertisements for Recall of Hydro Air Part Number 10-6200 Main Drain Cover

Dear Judy,

Enclosed please find a listing of Trade publications and insertion dates for our "Main Drain Recall" advertisements. Also attached are copies of the ads themselves.

If you have any questions after reviewing the information, please contact me at your convenience.

Sincerely,

David Allen
V.P. Manufacturing

c: Jerry Moreland
Darrell Crosby
Diane Forsdick

8

MAIN DRAIN RECALL AD PLACEMENT 1997

SERVICE INDUSTRY NEWS

1/2 page Horizontal B&W

Insert Date
WPSS & PIE
1997

*SHOW ISSUES
FEB & SEPT/OCT*

AQUA MAGAZINE

1/2 page Horizontal B&W

Insert Date
Mar & Aug
1997

SWIMMING POOL/SPA AGE

1/2 page Tab Horizontal

Insert Date
May & Oct
1997

POOL N SPA NEWS

1/2 page Horizontal

Insert Date
April & Sept
1997

THE ULTRA-SAGE

The Rocket Chair

Row on Row of Adjustable Massage Jets for an "All Over" Massage

Top Load

"Easy Access Filter"

- Nonpressurized for Safety
- 50 Sq. Ft. Filter
- Large Debris Catching Tray
- Floating Gate

Multi-Function

Hydro Therapy Jets

- Swirl Jet or Direct Flow Jet
- Variable Water Control Pressure
- Easy 'Clip Out' for cleaning & serviceability

Angled Pulsating Jets

For the Ultimate Foot, Leg and Calf Massage

Contoured Multi-Level Seating

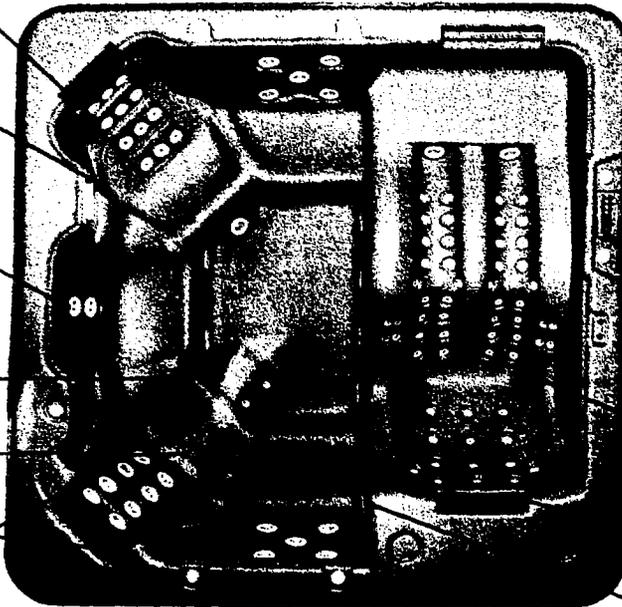
A perfect seat and soaking level for everyone

Massage Neck Jets

- Valve Controlled Pressure
- Cone Spray Pattern

Extra Large Footwell

- For Maximum Seating
- Good depth for more footroom



Inside & Around

- 3.5 HP "High Pro" Jet Pump
- 3.5 HP "High Pro" Jet Pump
- 3.5 HP "High Pro" Jet Pump
- C.C.S. "Silent" Pump
- 6 KW Heater
- Variable Light System
- Lighted Grabrails
- Equipment Enclosure
- Raised & Removable "Executive" Skirt
- Multiport ozone system

Electronic Fully Programmable Control System

- Programs & Displays: Time, Temperature, Jet & Time Clock
- Night Light
- Variable Light Dimmer Control
- Lock-out Control

Power Massage Lounges

- Motorized High Flow
- Wave Projection - Back, legs, thighs & wrists
- Controlled "Back and Forth" Massage
- Remote Control Panel

Soft Headrest System

- Pops Off for Easy Cleaning
- Pin Control for Long Life

Reverter Swim Jet

- Change Over Valve/Control
- Whole Body Massage

96"x96"x41"

Clearwater Spas

19730 144th Ave., N.E. • Woodinville, WA 98072 • (206) 483-1877 • Fax (206) 487-1148

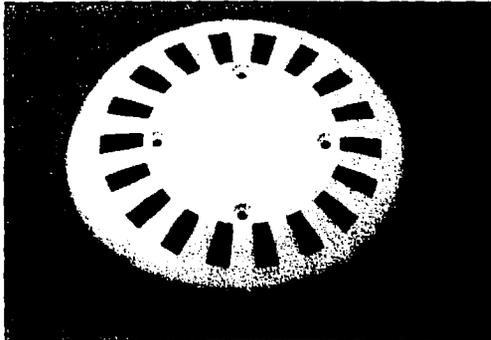
Circle 39 on Postage Free Card

SAFETY WARNING

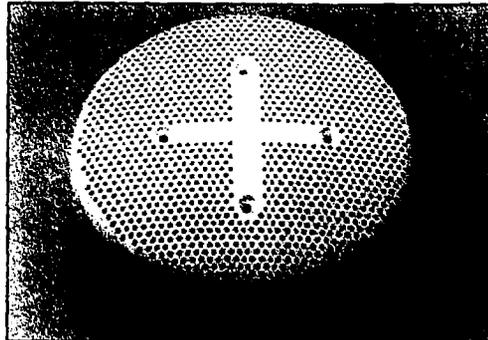
HYDRO AIR INDUSTRIES RECALL/REPLACEMENT

Main Drain Covers for Spas, Hot Tubs, & Swimming Pools Part #10-6200

The Consumer Product Safety Commission, in cooperation with Hydro Air Industries, has announced a recall of Main Drain Cover Part #10-6200 (Photo A) because of the danger of hair entrapment.



(A)



(B)

Three hair entrapment incidents have occurred; two resulted in death by drowning, and in one incident the victim was pulled free.

Please contact all customers (including consumers) who may have purchased Main Drain (A) and advise us immediately, so that arrangements can be made for exchanging the cover. **DO NOT REMOVE MAIN DRAIN COVER (A) UNTIL COVER (B) IS AVAILABLE FOR INSTALLATION.**

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE.
ORANGE, CA 92665
(714) 974-1820 • FAX (714) 974-5371
(800) 230-9580

Circle 73 on Postage Free Card

VINYL-LINER POOLS

twice about spending their disposable income, vinyl-liner pools are the affordable option.

For some time thought of as the wayward stepchild in the pool market, vinyl-liner pools have increased in beauty and popularity, and at the same time, have crossed income barriers that gunite pools often can't cross.

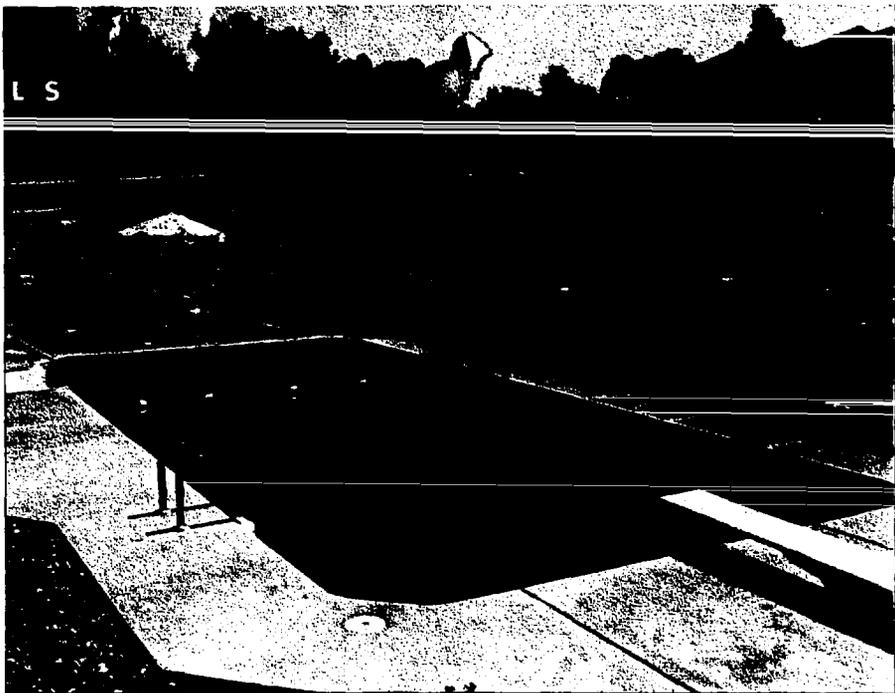
Andrew Kondl, president of Rocky Mountain Pools & Spas Ltd. in Calgary, Alberta, Canada, says his research has shown that the average vinyl-liner pool owner is part of a two-income family, is between 40 and 55 years old, and has children living in his or her \$150,000+ home.

This target market may seem too limited for a gunite pool builder, but that's because a comparably sized and equipped concrete pool can cost at least 25 percent more than a vinyl-liner pool. Zukose likes to tell people they are getting all the benefits of a pool that they wanted but at a fraction of the cost. The cost is a big deal to customers, and a point Zukose stresses along with value and quick installation.

Most vinyl-liner pools are kit pools whose walls are pre-fabricated and taken to the job site, where they are hooked together.

"It doesn't involve the rebar and gunite and all the other things that have to be form fitted at the job site, which increases labor and the cost of the pool," explains Rick Kraus, president of Aquaflex Vinyl Engineering Inc. in Sacramento, Calif., which manufactures vinyl liners.

James Shanni, vice president and general manager of The Liner Company, which also manufactures vinyl liners, further notes that although prices have increased in vinyl



All Poolside Services Inc. of St. Paul, Minn., installed this vinyl-liner pool, which complements the attractive landscaping.

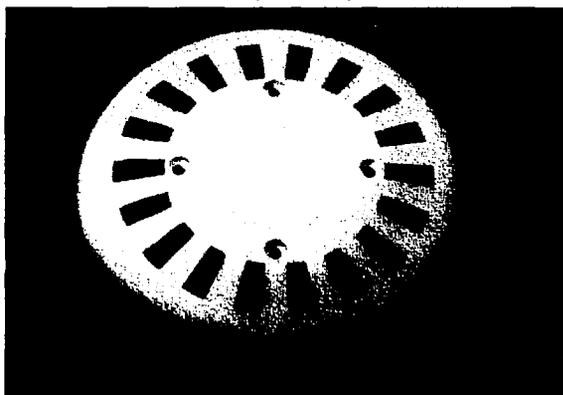
and in the vinyl pool market, the increases are less dramatic than those seen in other leisure goods and services. In fact, vinyl-liner pools have captured between 45 and 55 percent of the in-ground pool market, Shanni says, citing National Pool & Spa Institute statistics.

A healthy economy and the high customer satisfaction people experience with vinyl-liner pools have contributed to the rise in popularity, says Dan Currie, general manager of Pool Builders Supply, a vinyl-liner pool manufacturer in

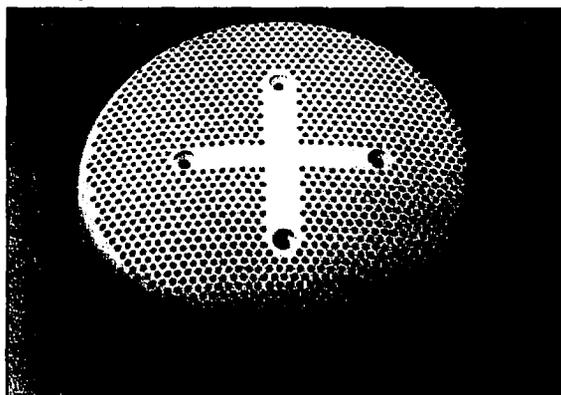
SAFETY WARNING HYDRO AIR INDUSTRIES RECALL/REPLACEMENT

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(A)



(B)

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Please contact all customers (including consumers) who may have purchased Main Drain (A) and advise us immediately, so that arrangements can be made for exchanging the cover. DO NOT REMOVE MAIN DRAIN COVER (A) UNTIL COVER (B) IS AVAILABLE FOR INSTALLATION.

**HYDRO AIR
INDUSTRIES INC.**



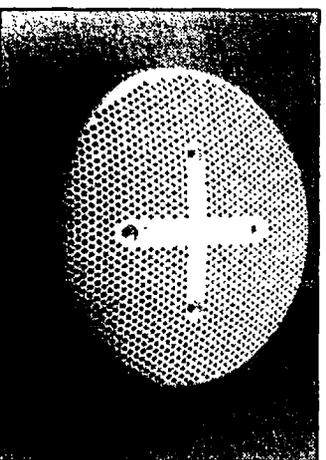
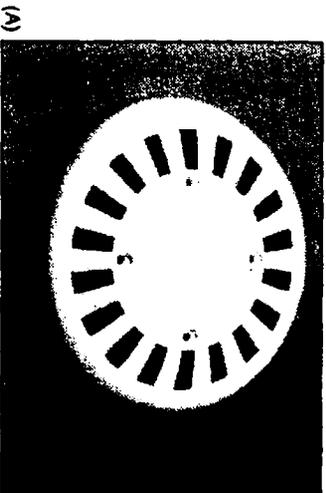
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SAFETY WARNING

HYDRO AIR INDUSTRIES RECALL/REPLACEMENT

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HYDRO AIR INDUSTRIES INC.



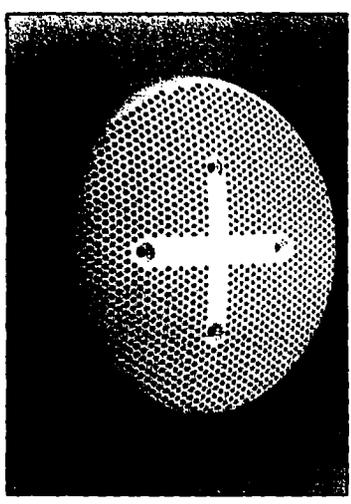
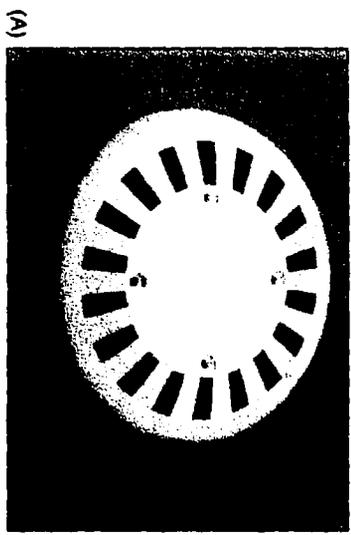
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SAFETY WARNING

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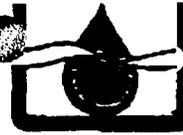
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1317 W. GROVE AVE.
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(714) 974-1920 • FAX (714) 974-5371
(800) 230-9560

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE. ORANGE, CA. 92665 ■ 714/974-1920

DATE: 2/21/97

TO COMPANY: CPSC - COMPLIANCE

ATTENTION: JUDY HAYES

FROM: DAVE ALLEN

NUMBER OF PAGES (INCLUDING THIS COVER SHEET): 4

MESSAGE: _____



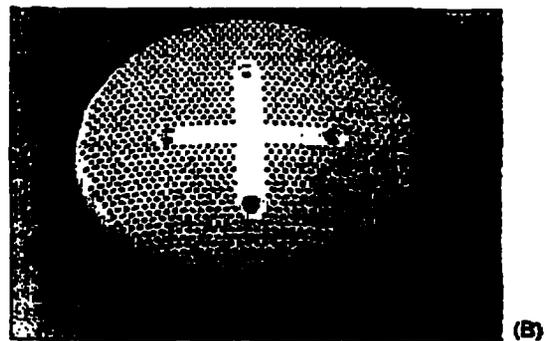
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HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA 92865 ■ 714/974-1920

January 1997

IMPORTANT RECALL NOTICE HAIR ENTRAPMENT HAZARD

Dear Sir/Madam,

In cooperation with the U.S. Consumer Product Safety Commission, Hydro Air Industries is recalling the Main Drain Assembly (P/N 10-6200) employed on all existing spas, hot tubs and swimming pools because of the potential danger of hair entrapment. Under certain circumstances a bather's head can be held under water if the bather's hair becomes entangled in the drain cover as the water and hair are drawn through the drain. Hydro Air has received reports of two deaths and one near drowning involving the 10-6200 series main drain cover.

We have designed a new Main Drain Cover to replace the 10-6200 series design. The replacement cover is being offered at no charge. It has a series of small holes and offers advantages in safety, flow and appearance.

Please advise your dealers, installers, homeowners or anyone else who may have a Spa, Hot Tub or Swimming Pool employing our Main Drain Assembly (P/N 10-6200), of this recall as soon as possible. The part in question is 6 inches in diameter, has 18 3/4" X 5/15" rectangular openings on the face and has the following markings:

"Flow Rate 60 GPM. Hydro Air P/N 10-6200"

All inventory of the 10-6200 should be returned to Hydro Air Industries to be replaced with the new designed Main Drain Cover.

To Assist Hydro Air in contacting homeowners or facility operators that may have the (P/N 10-6200) Main Drain Cover installed, we ask that you send us a list of the full names and addresses for these installations. Upon receipt of this information, we will send the replacement cover to them at no charge.

Hydro Air Industries appreciates your cooperation in this recall. If you have any questions, please contact our office.



~~FOR OFFICIAL USE ONLY~~

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

OFFICE OF COMPLIANCE

Division of
Corrective Actions
Tel: 301-504-0608
Fax: 301-504-0359

APR 14 1997

Certified Mail

Dave Allen
Vice President Manufacturing
Hydro Air Industries, Inc.
1317 West Grove Avenue
Orange, CA 92665

Re: CPSC RP940116
Hydro Air Industries, Inc.
Model 10-6200 Suction Fitting

Dear Mr. Allen:

The staff of the Office of Compliance of the U.S. Consumer Product Safety Commission has reviewed the actions proposed by Hydro Air Industries, Inc. concerning the model 10-6200 suction fitting. Acting under delegation from the Commission, the staff has accepted the plan as adequate.

Please continue the corrective actions implemented and initiate any others contained in the plan accepted by the staff. The Division of Corrective Actions will be monitoring the firm's corrective action plan. Please submit monthly progress reports of the recall to U.S. Consumer Product Safety Commission, Division of Corrective Actions, Tina Adeyeye, 4330 East West Highway, Room 613, Washington, D.C. 20207-0001 by the first of each month or fax to (301)504-0359. If you have any questions, please contact Tina Adeyeye on (301)504-0608 extension 1223. Please reference the CPSC file number in your response.

The Division of Corrective Actions will evaluate the effectiveness of the plan. The staff could seek broader corrective action if the corrective action plan does not prove effective.

If the firm receives or learns of any information concerning other incidents or injuries, or information affecting the scope, prevalence or seriousness of the defect or hazard, it must report that information to this Division immediately. Additionally, if the firm receives information which might indicate that its corrective actions are not satisfactory in eliminating the defect or hazard or that the effectiveness of the corrective action program is less than has been anticipated, it must report that information to this Division immediately.

When the firm determines the corrective action plan has been implemented to the best of its ability and as many products as possible have been removed from the marketplace, it may submit a final progress report, referencing the file number, and request that the file be closed. At that time the staff will review the plan's progress and decide whether the file should be closed.

Section 6(b)(1) requires the Commission to give notice thirty days in advance of the intended disclosure of information that identifies the manufacturer or private labeler of a product. The staff is enclosing a summary of the corrective action plan. The Commission publishes a list of product recalls and other corrective actions initiated by firms in an Annual Report to Congress. This information is also occasionally used in lists for specific product categories. This letter gives the firm its opportunity under section 6(b)(1) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2055(b)(1), and 16 C.F.R. Part 1101, to comment on the accuracy of the information.

The staff has made every effort to assure that the enclosed information is accurate. If, however, the firm believes that the information is not accurate, please send comments to Judith Hayes. The firm's comments must be received within twenty-three calendar days of your receipt of this certified letter if they are to be considered. Please include with any comments specific information to support any claim that the information is not accurate. If the Commission decides to disclose the information, unchanged, over any accuracy objections, it will give the firm ten (10) working days notice, as required by section 6(b)(2) of the CPSA, 15 U.S.C. § 2055(b)(2).

Thank you for your continued cooperation in this matter. If you have any questions, please contact Judith Hayes, at: (301) 504-0608, extension 1355. To respond to this letter using the U.S. Postal Service, please address your correspondence to: Division of Corrective Actions, U.S. Consumer Product Safety

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RP940116

Commission, Washington, D.C. 20207-0001. For other delivery services, please address the material to: Division of Corrective Actions, U.S. Consumer Product Safety Commission, Room 613, 4330 East West Highway, Bethesda, MD 20814-4408. The Office of Compliance telefax number is (301) 504-0359.

Sincerely yours,


Marc J. Schoem
Director
Division of Corrective Actions

Enclosures:

Corrective Action Summary
Progress Report Form

cc: Consumer Product Safety Commission
Western Regional Center
2000 North Plano Road
Suite 103-125
Richardson, TX 75082

Judith Hayes, CCA
Tina Adeyeye, CCA

Page 4
RP940116

Voluntary Corrective Action Plans Under Section 15
of the Consumer Product Safety Act and
Section 15 of the Federal Hazardous Substances Act

The following is a list of voluntary corrective action plans recently accepted by the Commission (or the staff acting under authority delegated by the Commission). A firm's taking corrective action does not constitute admission by the firm that a substantial product hazard exists.

Space does not permit the staff to give a complete list of the specific model numbers of the products involved in each of these corrective actions. Consumers who believe that they have a product affected by one of these actions should follow the instructions given in this list or contact either the manufacturer or the Commission to determine if their product is one of those affected.

**Voluntary Corrective Action Plans Under
Section 15 of the Consumer Product Safety Act and
Section 15 of the Federal Hazardous Substances Act**

DATE	FIRM AND PRODUCT	ALLEGED HAZARD	REMEDY
03/97	Hydro Air Industries, Inc. Orange, CA Spa and pool suction drain cover, model 10-6200	A spa or pool bather's hair may become entangled in the drain cover presenting a drowning hazard.	The firm recalled the drain cover offering consumers a free replacement.

CORRECTIVE ACTION PLAN PROGRESS REPORT

For period Ending: _____

Case # : RP940116 CO: Judith Hayes
 Product: Model 10-6200 Suction Fitting

Company Name: Hydro Air Industries, Inc.
 Total Affected: _____

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1) PRODUCTS CORRECTED

Location of Products	Total Products	Corrections This Period	Total Corrections	%Corrected
With Manufacturer	_____	_____	_____	_____
With Distributor	_____	_____	_____	_____
With Retailers	_____	_____	_____	_____
With Consumers	_____	_____	_____	_____
Total	_____	_____	_____	_____

2) CONSUMER AWARENESS OF PROGRAM

Type of Notification	This Reporting Period	Total
Bill Stuffer	_____	_____
Direct Mail Letter	_____	_____
Magazine	_____	_____
Newspaper	_____	_____
Other/Unknown	_____	_____
Pediatrician Poster	_____	_____
Phone Call	_____	_____
Product Catalog	_____	_____
Radio	_____	_____
TV	_____	_____
Retail Store Poster	_____	_____
VNR	_____	_____

3) Calls to 800 Number/Correspondence

800 Number Written Requests	This Reporting Period	Total
_____	_____	_____
_____	_____	_____

Note: Submit completed form by the 1st of each month to Tina Adeyeye at
 U.S. Consumer Product Safety Commission, Office of Compliance
 4330 East West Highway, Room 613
 Bethesda, MD 20814
 OR, fax to (301)504-0359. If you have any questions, please call Tina at (301)504-0608, ext 1223



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

DIVISION OF
CORRECTIVE ACTIONS
FAX: 301-504-0359

Tel: 301-504-0608

DATE: 2, 27, 97 PAGES TRANSMITTED 1 + cover

TO: Dave Allen

TITLE: _____

OFFICE: Hydro Air

FAX #: 714-974-5371

- Confirmation copy to follow by U.S. Mail
 Fax Transmission Only

FROM: Judith Hayes

REMARKS: Attached is list of CPSC employees to visit 3/3/97 - Expected time of arrival is between 2:00 + 2:30 pm.

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE.

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Hydro Air On-Site Visit, March 3, 1997

Dave Allen
Vice President, Manufacturing
Hydro Air Industries, Inc.
1317 W. Grove Avenue
Orange, CA 92665
(714) 974-1920, ext.18

Nick Marchica
Director Mechanical Engineering
CPSC
(301) 504-0494, ext.1450

Roy Deppa
Mechanical Engineer
CPSC
(301) 504-0608, ext.1306

FIELD ACTIVITY COVERSHEET

1. REGION/STATE FOWR/LOS	2. OPERATION (Check One) <input checked="" type="checkbox"/> <i>Inspection</i> <input type="checkbox"/> <i>Establishment Visit</i> <input type="checkbox"/> <i>Telephone Contact</i> <input type="checkbox"/> <i>Investigation</i> <input type="checkbox"/> <i>Other</i> []	3. DATE 1-30-97 <hr/> 4. NUMBER (For RO Use) 970115CCA4127	
5. ESTABLISHMENT Name: [Hydro Air Industries, Inc.] Address: [1317 W. Grove Avenue] City: [Orange] State: [CA] Zip: [92865] Telephone: [(714) 974-1920]			
6. RELATED FIRM <input type="checkbox"/> <i>Parent</i> <input type="checkbox"/> <i>Headquarters</i> <input type="checkbox"/> <i>Subsidiary</i> <input type="checkbox"/> <i>Other</i> _____ Name: [] City: [] State: []			
7. PRODUCTS COVERED [Pool/spa drain cover] []	8. OTHER CONSUMER PRODUCTS [] []		
9. ESTABLISHMENT TYPE <input checked="" type="checkbox"/> <i>Manufacturer</i> <input type="checkbox"/> <i>Importer</i> <input type="checkbox"/> <i>Wholesaler</i> <input type="checkbox"/> <i>Own Label Distributor</i> <input type="checkbox"/> <i>Retailer</i> <input type="checkbox"/> <i>Repackager</i> <input type="checkbox"/> <i>Other:</i> []	10. ANNUAL PRODUCTION Product Covered \$ Units: [] Other Products \$ Units: []		
11. I.S. BUSINESS % Received [] % Shipped []	12. SAMPLES COLLECTED None	13. MIS CODE 32626	14. HOURS Activity [6] Travel [1]
15. REASON FOR ACTIVITY (Assignment Reference) F/U to 970115CCA4127			
16. ANNOUNCED <input checked="" type="checkbox"/> <i>Rationale for Announced Inspection</i> Limited inspection plan was negotiated with Hydro Air official by headquarter's staff. Inspection was conducted in accordance with headquarter's direction. UNANNOUNCED <input type="checkbox"/>			
17. EMPLOYEE'S NAME Michael Krause	TITLE PSI	SIGNATURE	
18. (x) ENDORSEMENT <input type="checkbox"/> <i>REMARKS</i> <input type="checkbox"/> <i>SUMMARY</i> <input type="checkbox"/> <i>OTHER</i> [] At CCA's direction, 4 Hydro Air customers per CPSC region affected by the main drain cover (Model #10-6200) recall were chosen at random from a computer generated list provided to this investigator at the Hydro Air facility in Orange, CA on January 30, 1997. (A total of 16 customers were randomly chosen from a customer list that identified 882 firms.) NOTE: This firm's Zip code has changed from 92665 to 92865.			
19. REVIEWER'S NAME Keven Barton	TITLE Supervisor	SIGNATURE	
20. REVIEW DATE February 03, 1997	21. DISTRIBUTION: O: CCA (J.Hayes); cc: FOWR (N. Allen) c/s: FOWR (L.Baxter/L.Cornell/K.Barton).		

EIR: Hydro Air Enterprises, Inc.
1317 W. Grove Ave.
Orange, CA 92865
(714) 974-1920
Michael Krause
January 30, 1997
970115CCA4127

BACKGROUND

This limited inspection involved an establishment visit to obtain a partial customer list of firms affected by a Hydro Air recall of main drain covers (Model 10-6200) in spas, hot tubs and swimming pools. The partial customer list is for recall monitoring purposes.

INDIVIDUAL RESPONSIBILITY

On January 30, 1997, I presented my credentials and issued an Inspection Notice to Hydro Air Enterprises, Inc. (HAEI) Manufacturing Vice President Dave Allen at the HAEI facility in Orange, CA.

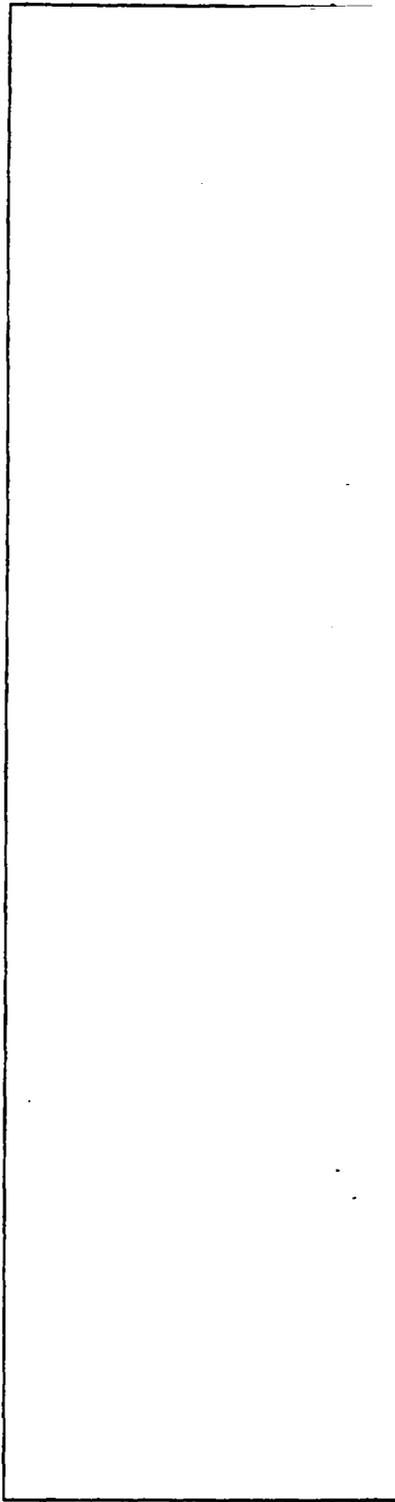
SUMMARY OF FINDINGS

Mr. Allen offered a computer generated customer list, which identified a total of 882 HAEI product distributors and OEM part suppliers affected by the recall. From this list I randomly chose four customers per CPSC region (a total of 16) comprising the partial list attached as Exhibit 2.

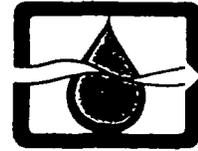
A copy of the partial customer list was electronically transmitted to CCA (J. Hayes) on January 30, 1997.

EXHIBITS

1. Inspection Notice
2. Partial Customer List
Assignment



HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA. 92665 ■ 714/974-1920

January 31, 1997

Dear Sir / Madam,

We have designed a new Main Drain Cover that must be replaced on all existing Spas, Hot Tubs and Swimming Pools employing our Main Drain Assembly (P/N 10-6200).

The new cover is being offered at no charge. It has a series of small holes and offers advantages in safety, flow, and appearance.

Please advise your dealers, installers, homeowners or anyone else who may have a Spa, Hot Tub, or Swimming Pool employing our Main Drain Assembly (P/N 10-6200), as soon as possible. The part in question is 6 inches in diameter, has 18 3/4" X 5/16" rectangular openings on the face and has the following markings. "Flow Rate 60 GPM, Hydro Air P/N 10-6200".

The information we need for replacement is the homeowner's (or facility operator's) full name and address. Upon receipt of this information, we will send the replacement cover at no charge.

We appreciate your cooperation in this matter. If you have any questions please contact our office.

*** ACTIVITY REPORT ***

TRANSMISSION OK

TX/RX NO.	9029
CONNECTION TEL	917149745371
CONNECTION ID	
START TIME	12/16 11:31
USAGE TIME	12'46
PAGES	18
RESULT	OK

TDI
960821CAA5543
2nd death



9029

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

DIVISION OF
CORRECTIVE ACTIONS
FAX: 301-504-0359

Tel: 301-504-0608

DATE: 2, 16, 96 PAGES TRANSMITTED 17 + cover

TO: Dave Allen

TITLE: _____

OFFICE: Hydro Air

FAX #: 714-974-5371

- Confirmation copy to follow by U.S. Mail
- Fax Transmission Only

FROM: Judith Hayes

REMARKS: IDE investigation

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

copy

October 18, 1996

David Allen
V.P. Manufacturing
Hydro Air Industries, Inc.
1317 W. Grove Avenue
Orange, CA 92665

RE: CPS RP940116
Hydro Air Industries
Model 10-6200 Suction Fitting

Dear Dave,

Thank you for your correspondence of October 9, 1996 outlining your firm's proposed corrective actions regarding the above mentioned suction fitting. We submit the following concerning this matter:

- (1) Concerning the print ads in 3 trade magazines:
 - Please submit the names of the magazines and an idea of their circulation range compared to other trade magazines not chosen.
 - Inform us of the size and use of color.
 - Please submit a draft copy of the ad for our review.
 - We suggest that the ads be published in the spring and fall issues, if possible.

- (2) We suggest the use of warning posters at retail and supplier locations that sold the subject suction fitting. The posters are generally displayed for 120 days in attempt to warn and inform as many consumers as possible of the recall. Information regarding retail posters is enclosed for your review.

- (3) Use of a video news release (VNR), which is the television version of the printed press release. I have enclosed background information and guidelines concerning the use of VNR's that should answer a lot of your questions.

- (4) Please submit a list of the companies that distributed the subject suction fitting in order that the corrective action program can be monitored to determine whether it is being implemented appropriately by your companies. The list

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should include the names, as well as, the addresses of the companies.

(5) Please submit all draft notices to our attention for review prior to finalization.

Once you have reviewed the above, please contact us to discuss this matter further. Thank you.

Sincerely,

Judith Hayes
Compliance Officer
(301) 504-0608, ext. 1355

Enclosures

POINT OF PURCHASE RECALL POSTER CHECKLIST

Use the following checklist to ensure that all required information is included in the point of purchase poster or counter card:

1. **RECOMMENDED SIZE:** Posters should be a minimum of 11 x 17 inches (folded once, becomes 8 1/2 x 11 inches and will fit in standard size mailing envelopes or boxes for quantity mailing). Counter cards should be a minimum of 8 1/2 x 11 inches.
2. **COLOR:** Heading should be in red. Also consider using red for key information for consumer response, such as 800 numbers or, in case of severe hazard, phrases such as "WARNING, STOP USING AT ONCE, TAKE AWAY FROM CHILDREN IMMEDIATELY." Red might also be used in part of graphic to illustrate product and potential hazard.
3. **USE OF GRAPHIC/PHOTOGRAPH:** Wherever possible, the poster should contain a graphic illustration or photograph of the product to aid consumers in identifying the product. A graphic illustration is preferable because it usually shows up better. However, photographs may be used if they provide a good, clear picture of the product. For graphics, if possible pull out key information-- location of model number, date code, or other information essential to identifying the affected product. Use arrows or some other means to highlight hazardous part or area of product.
4. **WORDING:**
 - A. **HEADING:** Use "Safety Recall Notice," or "Important Safety Notice," as appropriate for the corrective action being taken.
 - B. **FORMAT:** The information included should indicate Who (recalling firm), What (the product), and Why (reason for recall) and should tell consumers what to do. Outline format is preferable to paragraphs. Use "word cluster" to keep key information together rather than sentences. Do not break up word clusters between two lines. Keep it brief!
 - C. **800 NUMBER:** If using an 800 number, highlight it somehow -- red color, large, bold print. Use a separate line for the number so that it really stands out.
 - D. **FIRM IDENTIFICATION:** Manufacturer/Importer/Retailer name should also stand out. It helps get the consumer's attention.
 - E. If product is to be mailed to the manufacturer or the consumer can write to the manufacturer for information about the recall, place the firm name and address at bottom of poster.
5. **TIME FOR DISPLAYING POSTERS:** Posters should be up for approximately 120 days in several conspicuous locations in the store (shelf where product was sold, check-out counter, service desk, at entrance or exit). Put a date on the bottom of the poster: "Post until August 1, 1992."

VIDEO NEWS RELEASE GOALS AND GUIDELINES

Background

A video news release (VNR) is the television version of the printed press release, translating the printed word into the language of moving pictures. It is distributed at no cost via satellite to television stations nationwide.

VNRs are essential staples of any video public relations campaign. They effectively transmit news of a product recall to television news decision-makers (producers and news directors) in the form they need.

While usually aired in edited form, VNRs provide proven reliable television exposure for your news. They are produced in broadcast news style with a scripted story and compelling video.

There are two types of VNRs: "Packages," pre-edited videos with a professional voice-over, similar to television news stories; and "Bite and Cover," which includes "sound bites," or brief snippets of interviews with company representatives or CPSC Chairman Ann Brown, and "b-roll," edited, eye-catching footage which makes it easy for TV news producers to air the video on newscasts.

Hire a professional production company to write, produce, edit, and distribute your VNR. CPSC's Office of Public Affairs can provide suggestions for production companies and show samples of their work. Public Affairs will also help every step of the way as the video is produced.

Content basics

Television journalists are in the business of presenting news with moving pictures; a VNR must meet that need.

Like press releases, VNRs need to communicate basic information in order to be successful. When writing VNR scripts, remember that in order for this information to reach consumers, it first must be picked up by television stations -- which means the script is written for television producers.

VNR scripts, which the production company writes for the client, are written and negotiated like press releases. They must go through the same CPSC clearance process as press releases.

The following information must be included in your VNR in order for it to appeal to television journalists:

Number of products sold - This information, which should be included in the very first sentence or two of the VNR, gives an immediate idea of the magnitude of the problem.

Description of the hazard - States the possible consequences of using or keeping the product or ignoring the remedy. This information must be clearly explained as it provide "the meat" of the VNR. Consumers should be told what could happen to them if they use this product.

Number of injuries and deaths - By focusing on the consequences of using a product or using it in a hazardous manner, this information strengthens the chance that the media will use the VNR. When possible, include a breakdown of deaths by state -- this helps the media "localize" the story.

Where were the products sold (names and locations of retailers, dealers, catalogues) and how much did they cost - This information helps the media "localize" the story to their viewers and provides consumers with information that may be needed to clarify product models involved in the recall or locations for more details.

Time period during which the products were sold - This information helps the consumer identify a product or product model that may have been purchased.

What should people to do with the recalled product? Include a phone number. We need to tell the media how the consumer should proceed with the dangerous product. Make sure the phone number or toll-free hotline number is accurate.

Much of this information appears on background slates at the beginning of the VNR, as well as in the voice-over in the package. A very brief, one-sentence summary of the story also appears at the beginning of the package as the "Suggested Anchor Lead," which local news anchors read before the video is played.

Production basics

Keep these 10 points in mind when producing a VNR:

- Shoot on videotape in broadcast news style, emphasizing quick cuts and non-commercial production values.
- A VNR package (full narrated story with announce track) should run one and a half to two minutes long, followed by three to five minutes of b-roll. B-roll is supplemental unedited video to help the TV news producer edit the story for air. It should include clean shots of the product from a variety of angles. B-roll should also include shots of the product without people, shots of the product in use, and shots of the product in its natural setting. For example, a dishwasher could be shown in a kitchen, with people loading dishes into it, and again without people loading dishes.
- A VNR comprised of b-roll only (no narrated package) is effective when the story is self-evident, and the TV news producer does not need detailed context of the "spin" of a script to understand it. This is rarely the case with recall VNRs.

- The package should be produced with split audio channels (separate channels for the announce track and natural sound on tape), or in two versions, one with the announce track and the natural sound combined throughout, followed immediately by same package with natural sound only. This allows the TV news producer maximum flexibility in presenting the story.
- The subject of interview soundbites in the VNR should be looking at the interviewer slightly off-camera to the right or left. Teleprompters (tv screens that show the script to the subject) are good tools to use if the subject is not fluent in minute details of the recall, if the subject has just one or two lines to say and an actual interviewer is not present, or if it makes the subject more comfortable.
- The production company should present all supers (names and titles of people interviewed in or speaking on the video) or Chyrons on a slate at the start of the VNR rather than on the tape during the VNR. This allows stations to recreate the information in their own type style. Make sure the sequence of identifications on the slate matches their order of appearance in the VNR.
- For technical or otherwise complex stories, use graphics and animation to illustrate key points.
- Never allow your reporter to do a stand-up (on-screen appearance) in the VNR, and never produce a bed of music under the package.
- Do not blatantly hype your company, product, or service. Show logos only if it helps identify the product.
- Make sure your video news release has news that lends itself to television. If you can imagine your story on TV news, you have the makings of a VNR.

Distribution basics

The best VNR in the world won't be used unless it is well-promoted and widely distributed. In addition to buying satellite time to broadcast your VNR to stations around the country, effective distribution includes a media alert that tells stations when and how to pull down the video; enough time for a satellite feed to be effective; and usage monitoring so you can tell the reach of your VNR. (Hard copies of the tape should also be available, in case a station requests a copy.)

Buying satellite time -- The production company should purchase a half-hour of C-band satellite time to "broadcast" your VNR to the media. The entire package will be fed on a continuous loop for the entire half-hour, to ensure that stations have access to the feed.

If possible, purchase time between 1 and 3:30 p.m. Eastern time on Tuesday, Wednesday, or Thursday -- this will help your story reach the widest audience. Purchase time for the same day that the press release is scheduled.

When the production company purchases satellite time, it will receive a set of numbers called "coordinates." Coordinates tell TV producers when the VNR is available and how they can "grab" it for their stations. Satellite coordinates include feed date, time, Telstar and Transponder numbers, downlink frequency, and audio channels. Always purchase time on C-Band satellites -- it's easiest for most stations to use.

Tell the production company to "Sigma-code" the VNR before it's fed. This will help you track your audience.

Advance notification of the VNR's satellite feed -- As soon as satellite coordinates are available, they should be forwarded to CPSC's Public Affairs office. On the day before the feed, the Public Affairs office will fax a media alert, which includes very general information about the content of the story and the satellite coordinates, to broadcast media.

The alert should include two contact names: one name for more story information and one name to contact for technical questions. The contact for story information should be someone in CPSC's Public Affairs office, or a company spokesman. The technical contact should be someone at the production or distribution company who can answer questions about satellite coordinates and other technical questions.

The production company should also send out its own alert with the same information, on the day before the feed, nationwide. In addition, the production company should call targeted stations nationwide to pitch the story.

Avoid "stepping on your story" by talking to the media the day before a feed, or leaking the story to the press (even local press).

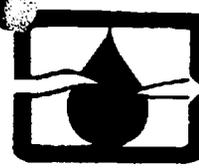
Satellite feed -- On the day of the satellite feed, the media may call with questions about the feed or the content of the VNR. Many news outlets won't call during the actual feed, but may call afterward to clarify some information or to request hard copies of the tape.

Usage monitoring -- To get an idea of how many people saw your VNR, make sure your distributor can provide usage sheets based on electronic tracking services such as Nielson and Radio/TV Reports. Your usage reports should contain detailed information by market, station, affiliation, time and date of airing, length of confirmed video usage, and potential audience by station.

Samples

Public Affairs has worked with a number of manufacturers and various production companies to produce VNRs for a variety of products. A sample press release, media alert, and script are attached. Copies of this VNR and others are available in the Public Affairs office. We would be happy to sit down with you, watch sample tapes, and explain some of the factors that went into the production of each VNR.

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA. 92665 ■ 714/974-1920

October 9, 1996

CPSC
Compliance
Division of Corrective Actions
4330 East West Highway
Bethesda, Md. 20814-4408

Attn: Bill Moore

Re: Corrective action for Hydro Air Main Drain Cover

Dear Bill,

This letter will outline the actions we will take to address the safety concern you have raised about the current design of our Main Drain Cover.

1. We stopped sales of the current product effective October 24, 1995. If someone has called with a broken cover problem or an "open hole" in an installation, we have supplied covers. We feel for safety purposes, the current design is superior to either an open hole or a broken cover.
2. We redesigned the cover and tested it to ASME/ANSI A112.19.8M-1987 Suction Fittings for Use in Swimming Pools, Wading Pools, Spas, Hot Tubs, and Whirlpool Bathtub Appliances. We are currently building the molds for this re-designed product. Expected completion date is January, 1997.
3. Once the new drain cover is complete, we will begin a recall of all product in service in the United States.

All covers will be sent at no charge to anyone having a Main Drain Cover being recalled.

We will take the following actions to notify the public of the recall.

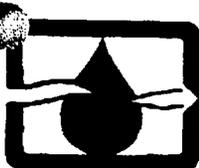
- A. Joint Press Release with the CPSC
- B. Print Ads in 3 Trade magazines

The ads will run according to our current schedule for 2 months. This will be two issues, covering two months for each of the three Trade magazines, not necessarily two consecutive issues for each publication.

*which mags?
size? color?
+ cost*

*Fall + spring would be good
54*

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA. 92665 ■ 714/974-1920

October 9, 1996

CPSC
Compliance
Division of Corrective Actions
4330 East West Highway
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- A. Joint Press Release with the CPSC
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*Retain posters
at suppliers
- VNR*

need list for monitoring

C. A Mailing to all customers.

The mailing will include:

- One copy of the trade ad
- One copy of the press release
- A cover letter giving instruction for requesting new covers, offering to send the new covers directly to the affected installations with instructions for replacement, and offering to supply additional copies of the trade ad and press release.

Bill, if you have any questions regarding any part of this corrective action plan, please contact me at your convenience.

*- need drafts
 - for mailing
 - paid
 - notice
 - ad
 - size
 - text
 - names of magazines
 - retail poster*

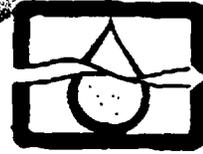
Sincerely,

David Allen
V.P. Manufacturing

c: Judith Hayes; CPSC

Bill's schedule
 10/9: 10:00 am - today ~~act~~
 10/10: 10:00 am - tom. ~~act~~
 10/11: off week

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA. 92665 ■ 714/974-1920

DATE: 10/9/96

TO COMPANY: CPSC

ATTENTION: JUDITH HAYES

FROM: DAVE ALLEN

NUMBER OF PAGES (INCLUDING THIS COVER SHEET): 3

MESSAGE: COPY OF OUTLINE FOR CORRECTING ACTION FOLLOWS

BEST REGARDS
DAVE A.



6598

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

DIVISION OF
CORRECTIVE ACTIONS
FAX: 301-504-0359

Tel: 301-504-0608

DATE: 10/3/96 PAGES TRANSMITTED 5 + cover

TO: Dave Allen

TITLE: _____

OFFICE: Hydro Air

FAX #: 714-974-5371

Confirmation copy to follow by U.S. Mail

Fax Transmission Only

FROM: Judith Hayes

REMARKS: Sorry for the delay. Press release examples attached. Look forward to receive your corrective action outline. jht

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

58

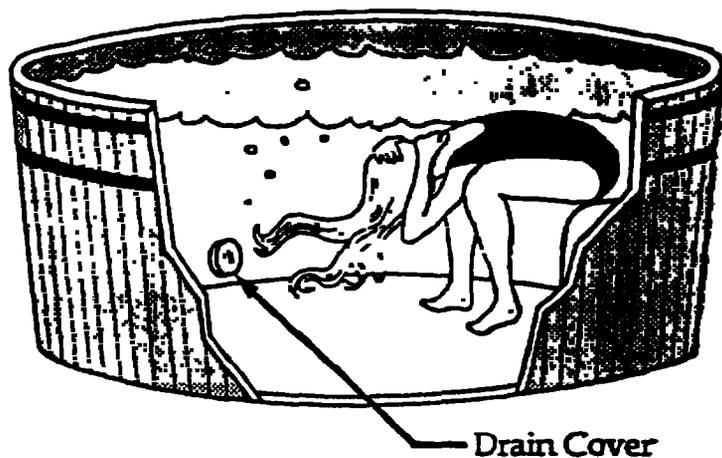
U.S. Consumer Product Safety Commission

"Spas, Hot Tubs, and Whirlpools" Safety Alert

The U.S. Consumer Product Safety Commission (CPSC) helped develop standards to prevent hair entanglement and bodypart entrapment in spas, hot tubs, and whirlpools. These standards should help prevent deaths and injuries. Consumers should fix their old spas, hot tubs, and whirlpools with new, safer drain covers. CPSC warns about these hazards:

- **Drownings** -- The main hazard from hot tubs and spas is the same as that from pools -- drowning. Since 1980, CPSC has reports of more than 700 deaths in spas and hot tubs. About one-third of those were drownings to children under age five. Consumers should keep a locked safety cover on the spa whenever it is not in use and keep children away unless there is constant adult supervision.

- **Hair Entanglement** -- Since 1978, CPSC has reports of 49 incidents (including 13 deaths) in which people's hair was sucked into the suction fitting of a spa, hot tub, or whirlpool, causing the victim's head to be held under water. Hair entanglement occurs when a bather's hair becomes entangled in a drain cover as the water and hair are drawn through the drain. In some incidents, children were playing a "hold your breath the longest" game, permitting their long hair to be sucked into the drain. CPSC helped develop a voluntary standard for drain covers that helps reduce the risk of hair entrapment. Consumers should be sure they have new drain covers that meet this standard. If you are not sure, call a pool or spa professional to check the spa. Never allow a child to play in a way that could permit the child's hair to come near the drain cover. If a drain cover is missing or broken, shut down the spa until the cover is replaced.



- **Bodypart Entrapment** -- CPSC knows of 18 incidents since 1980 in which parts of the body have been entrapped by the strong suction of the drain of pools, wading pools, spas, and hot tubs. Of these, 10 resulted in disembowelment and 5 other people died. CPSC helped develop a standard requiring dome-shaped drain outlets and two outlets for each pump. This reduces the powerful suction if one drain is blocked. Consumers with older spas should have new drain covers installed and may want to consider getting a spa with two drains.

- **Hot Tub Temperatures** -- CPSC knows of several deaths from extremely hot water (approximately 110 degrees Fahrenheit) in a spa. High temperatures can cause drowsiness which may lead to unconsciousness, resulting in drowning. In addition, raised body temperature can lead to heat stroke and death. In 1987, CPSC helped develop

requirements for temperature controls to make sure that spa water temperatures never exceed 104 degrees Fahrenheit. Pregnant women and young children should not use a spa before consulting with a physician.

***CPSC recommends these safety precautions
when using a hot tub, spa, or whirlpool:***

1. Always use a locked safety cover when the spa is not in use and keep young children away from spas or hot tubs unless there is constant adult supervision.
2. Make sure the spa has the dual drains and drain covers required by current safety standards.
3. Regularly have a professional check your spa or hot tub and make sure it is in good, safe working condition, and that drain covers are in place and not cracked or missing. Check the drain covers yourself throughout the year.
4. Know where the cut-off switch for your pump is so you can turn it off in an emergency.
5. Be aware that consuming alcohol while using a spa could lead to drowning.
6. Keep the temperature of the water in the spa at 104 degrees Fahrenheit or below.

U.S. Consumer Product Safety Commission, Washington, DC 20207 (301) 504-0580

009606

News from CPSC

U.S. Consumer Product Safety Commission

Office of Information and Public Affairs

Washington, D.C. 20207

For Immediate Release
June 3, 1996
Release # 96-139

Contact: Rick Frost
(301) 504-0580 Ext. 1166

CPSC Issues Warning for Pools, Spas, and Hot Tubs

WASHINGTON, D.C. - The U. S. Consumer Product Safety Commission (CPSC) is alerting consumers and public health officials to steps they can take to reduce entrapment deaths and injuries associated with pools, spas, and hot tubs.

The main hazard from hot tubs and spas is the same as that from pools -- drowning. Since 1980, CPSC has reports of more than 700 deaths in spas and hot tubs. About one-third of those were drownings to children under age five.

Other hazards include body part entrapment and hair entanglement.

Since 1980, CPSC knows of 18 incidents, including five deaths, involving children between the ages of two and 14 who were injured or died due to body part entrapment involving the drain of a swimming pool, wading pool, or spa. In addition, last week, a 16-year-old New Jersey girl drowned when her body was sucked down against a drain on the bottom of a spa. Her body apparently formed a vacuum seal against an outlet for circulating water and she was held underwater.

Under normal conditions, pipes leading from a pool's drain, or into the pool's pumps, draw water from the pool creating suction. If something blocks the pool drain leading into this pipe, the amount of suction will increase as the pump draws water past the obstruction. This increased suction can entrap parts of a person's body, causing the person to be held underwater. In wading pools, if a child sits on the drain outlet, the suction can cause disembowelment.

To reduce the risk of entrapment and drowning, current safety standards require that each spa have two outlets for each pump, lessening the amount of suction at any single outlet. Since 1978, CPSC has reports of 49 incidents (including 13 deaths) in which people's hair was sucked into the suction fitting of a spa, hot tub, or whirlpool, causing the victim's head to be held under water. Hair entanglement occurs when a bather's hair becomes entangled in a drain cover as the water and hair are drawn through the drain. CPSC helped develop a voluntary standard for drain covers that reduce the risk of hair entanglement.

61

(pool, spa, hot tub safety tips)

-2-

CPSC offers the following safety tips when using a hot tub, spa, or whirlpool:

- Always use a locked safety cover when the spa is not in use and keep young children away from spas or hot tubs unless there is constant adult supervision.
- Make sure the spa has the dual drains and drain covers required by current safety standards.
- Regularly have a professional check your spa or hot tub and make sure it is in good, safe working condition, and that drain covers are in place and not cracked or missing. Check the drain covers yourself throughout the year.
- Know where the cut-off switch for your pump is so you can turn it off in an emergency.
- Be aware that consuming alcohol while using a spa could lead to drowning.
- Keep the temperature of the water in the spa at 104 degrees Fahrenheit or below.

The U.S. Consumer Product Safety Commission protects the public from the unreasonable risk of injury or death from 15,000 types of consumer products under the agency's jurisdiction. To report a dangerous product or a product-related injury and for information on CPSC's fax-on-demand service, call CPSC's hotline at (800) 638-2772 or CPSC's teletypewriter at (800) 638-8270. To order a press release through fax-on-demand, call (301) 504-0051 from the handset of your fax machine and enter the release number. Consumers can obtain this release and recall information via Internet gopher services at cpsc.gov or report product hazards to info@cpsc.gov.

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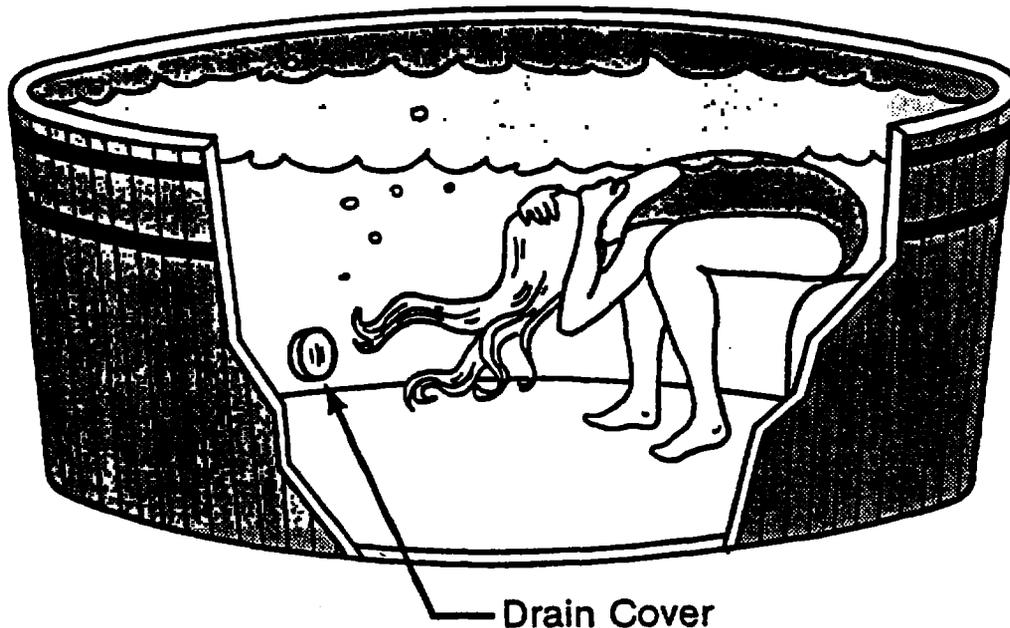
Consumer Product SAFETY ALERT

FROM THE U.S. CONSUMER PRODUCT SAFETY COMMISSION, WASHINGTON, D.C. 20207

June 1988

Four Children Drown And More Are Injured From Hair Entrapment In Drain Covers For Spas, Hot Tubs, And Whirlpool Bathtubs

The U.S. Consumer Product Safety Commission has reports of 14 incidents — including four deaths — in which people's hair was sucked into the suction fitting drain of a spa, hot tub, or whirlpool bathtub, causing the victim's head to be held under water. The suction from drain outlets is strong enough to cause entrapment of hair or body parts, and drowning. Most accidents with drain outlets involve people with hair that is shoulder-length or longer.



Hair entrapment occurs when a bather's hair becomes entangled in a suction fitting drain cover as the water and hair are drawn powerfully through the drain. In several incidents, children were playing a "hold your breath the longest" game, leaning forward in the water and permitting their long hair to be sucked into the drain.

Here are some safety precautions to help prevent hair entrapment in your spa, hot tub, or whirlpool bathtub:

- There is a new voluntary standard for drain covers (ASME/ANSI A112.19.8M-1987) that should help reduce hair entrapment. Ask your dealer about drain covers that meet this new voluntary standard.
- Keep long hair away from the suction fitting drain cover. Wear a bathing cap or pin hair up if you have long hair.
- Never allow a child to play in a way that could permit the child's hair to come near the drain cover. Always supervise children around a spa, hot tub, whirlpool bathtub, wading pool, or swimming pool.
- If drain cover is missing or broken, shut down the spa until drain cover is replaced.



copy

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

Certified Mail

AUG 08 1998

Dave Allen
Vice President, Manufacturing
Hydro Air Industries, Inc.
1317 W. Grove Avenue
Orange, CA 92665

RE: CPSC RP940116
Hydro Air Industries, Inc.
Model 10-6200 Suction Fitting

Dear Mr. Allen:

Pursuant to your request, enclosed are our staff's investigative report, IDI 960228CWE6001, and its addendum. As you are aware, this report pertains to the hair entrapment incident that occurred February 25, 1996 in Huntington Beach, CA and appears to involve Hydro Air's model 10-6200 suction fitting.

You may contact me regarding any concerns you may have about this report. Thank you.

Sincerely,

Judith Hayes
Compliance Officer
Division of Corrective Actions
(301) 504-0608, extension 1355

Enclosure

64

Judith Hayes
CPSC

8/1/96 10:00 AM
Dave Allen
Hydro Air

From

Company

Location

Fax #

Original
Disposition:

Dept. Charge

Telephone #

Destroy

Return

Call for pickup

Codes and Standards



**The American Society Of
Mechanical Engineers**

212 605-3333
212 605-8750 Fax

345 East 47th Street
New York, NY 10017-2392

July 29, 1996

**AGENDA
ASME / ANSI A112.19.7 & .8 WORKING GROUPS**

**Hyatt Harbor Hotel
BALTIMORE, MD**

(410) 798-6738

**Room Rate \$109.00 per night
August 27, 1996; 9 AM to 5 PM
August 28, 1996; 9 AM to Noon**

I. A112.19.7

A. OLD BUSINESS

- 1. **Flow Testing**
Jim Sargent Letter
- 2. **Flex Hose Preconditioning**
Proposed revisions to Section 5.1 - Perry Mickle
- 3. **Addenda**
 - a. **Markings**
 - b. **Backflow Requirements**
 - c. **Cautionary Label**

II. A112.19.8

A. OLD BUSINESS

65

1. Round Ro  Test Results
Dave Allen *wa*
2. Hydra Bath Comments
3. UV Stability
Dave Allen
4. Letter from G.G. Industries
5. Verification Testing
Perry Mickle
6. Body Entrapment *wa*

III. OTHER

1. IAPMO Referred Standards
Perry Mickle



copy

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

May 29, 1996

Fed Exp.

David Allen
V.P. Manufacturing
Hydro Air Industries, Inc.
1317 W. Grove Avenue
Orange, CA 92665

Re: CPSC RP940116
Hydro Air Industries
Suction Fitting 10-6200

Dear Mr. Allen:

As per our discussion on Wednesday, May 29, 1996, I am forwarding to your attention copies of the photo attachments to our IDI 960228CWE6001. The IDI report itself will be sent to you once the addendum have been added.

In regards to our staff's testing of the newest prototype, I have been informed by our engineering technical officer that the water temperature during testing is well below your minimum recommendation of 80 degrees and that the amount of time to test the device should fall within the time restraint of 6 hours of water exposure. Our test results should be available by mid June 1996.

Please contact me once you have reviewed the enclosed material to discuss any concerns you may have.

Sincerely,

Judith Hayes
Compliance Officer
Division of Corrective Actions
(301) 504-0608, ext. 1355

67

* User name: JPH (33) Queue: FS2/613-17_4SI_PQ
* File name: Server: 613-17_4SI_PS
* Directory:
* Description: WordPerfect - ltr.2
* May 29, 1996 2:39pm

J PPPP H H
J P P H H
J P P H H
J PPPP HHHHH
J P H H
J J P H H
JJJ P H H

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* L S S T
* L S T ::
* L SSS T ::
* L S T
* L S S T ::
* LLLL SSS T ::
*

**HYDRO AIR
INDUSTRIES INC.**



1317 W. GROVE AVE., GRANGE, CA. 92685 • 714/974-1920
FAX 714/974-5371

Dave Allen

24 MAY REC'D

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA. 92665 ■ 714/974-1920

MAY 21, 1991

JUDY,

HERE IS PROTOTYPE OF
NEW MAN DRAIN COVER.
I WILL HAVE INFO ON SUBMIT
OF PART IN WATER NEXT WEEK.
PLEASE DO NOT PUT IT IN
WATER BEFORE I GIVE YOU THE
INFORMATION.

ALSO INCLUDED ARE:

- 1.) A BLUE PRINT OF THE
PART.
- 2.) A LETTER FROM U.L.
SHOWING CURRENT TEST
STATUS.

70

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA. 92665 ■ 714/974-1920

March 12, 1996

CPSC
4330 East West Highway
Bethesda, Md. 20814-4408

Attn: Judith Hayes

Dear Ms. Hayes,

This letter confirms our recent phone conversation regarding the design change we are making our part number 10-6200.

We evaluated the first design and felt we could improve the performance further

We are evaluating our second design at this time. Our testing should be complete in a few weeks. We will forward the unit we choose as a replacement for your review when we make our decision. If you have any questions prior to our sending a prototype of the design we choose, please contact us at your convenience.

Sincerely,

David Allen
V.P. Manufacturing

c: Jerry Moreland
Bud Christopherson

'96 MAR 18 P12:05

CPSC CO
LITHO IN U.S.A.
MIN

HYDRO AIR 
INDUSTRIES INC.

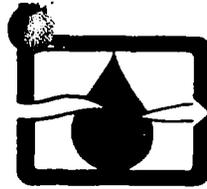
1317 W. GROVE AVE., ORANGE, CA 92665

ADDRESS CORRECTION REQUESTED

JUDITH HAYES
CPSC
4330 EAST WEST HIGHWAY
BETHesda, MD. 20814-4408

|||||

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA. 92665 ■ 714/974-1920

December 4, 1995

CPSC
Compliance
4330 East West Hwy
Bethesda, Md. 20814-4408

Attn: Judith Hayes

Dear Judy,

Enclosed please find a drawing of a revised design for the cover to our part number 10-6200.

It will take a few weeks for us to build and test a prototype.

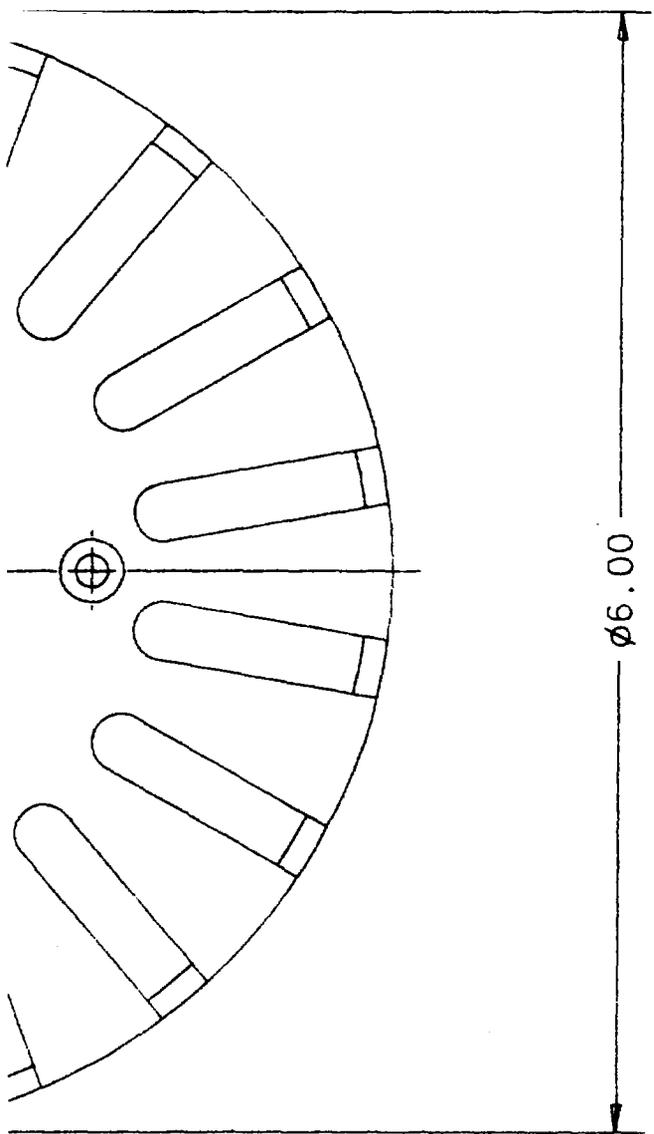
As soon as our preliminary testing is complete we will forward the result to you.

If you have any questions, please contact us at your convenience.

Sincerely,

David Allen
V.P. Manufacturing

c: Jerry Moreland
Bud Christopherson



$\phi 6.00$

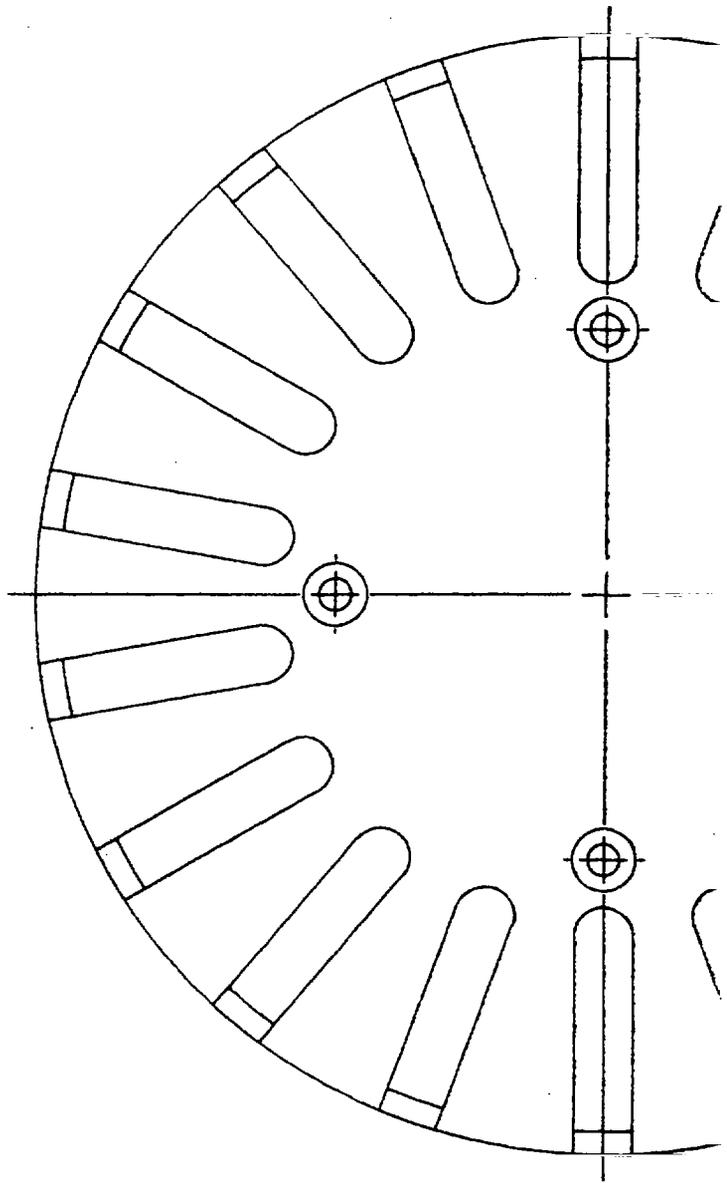
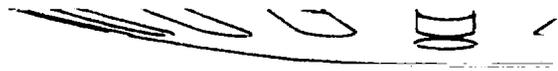
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4

175



3

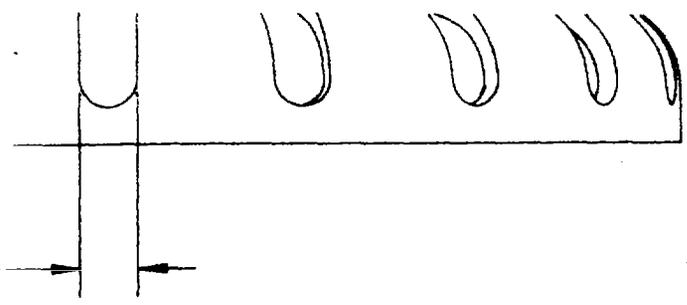
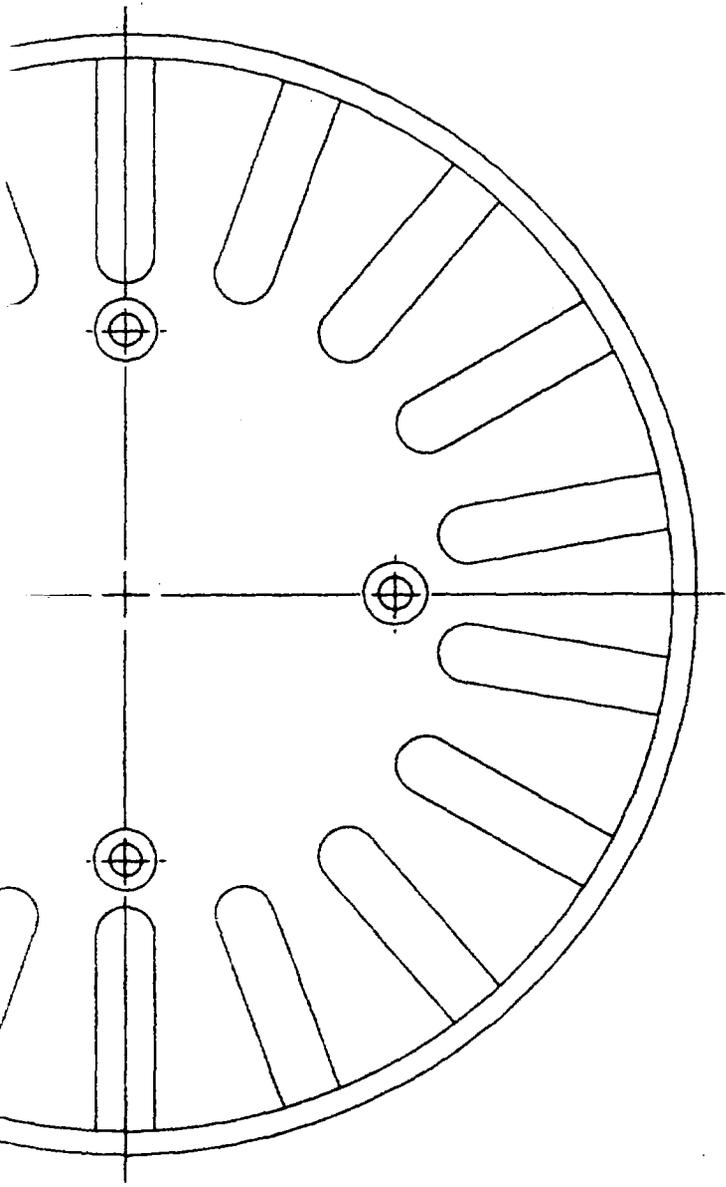
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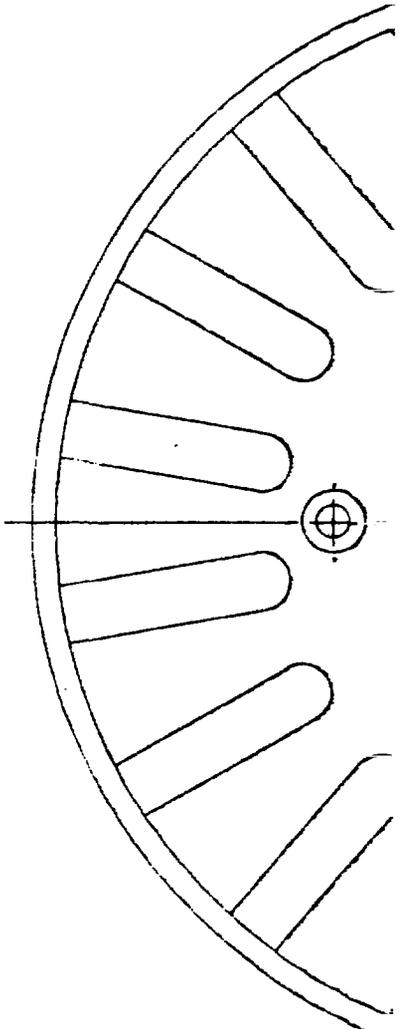
D

C

76

REVISIONS				
ZONE	REV	DESCRIPTION	DATE	APPROVED





1.17

QTY REQD		FSCM NO	PART OR IDENTIFYING NO	NOMENCLATURE OR DESCRIPTION	MATERIAL SPECIFICATION	ITEM NO
PARTS LIST						
UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES TOLERANCES ARE:			CONTRACT NO.			
FRACTIONS .XX- + DO NOT SCALE DRAWING			APPROVALS			
DECIMALS .XXX- + DO NOT SCALE DRAWING			DATE			
ANGLES ±			TITLE			
TREATMENT			DRAWN			
FINISH			CHECKED			
SIMILAR TO			ISSUED			
ACT. WT			SCALE FULL			
CALC WT			SIZE FSCM NO.			
			DWG NO.			
			SHEET 1 OF 1			

HYDRO AIR INDUSTRIES INC.
 1517 W. GROVE, ORANGE, CA 92660 • 714/971-1870

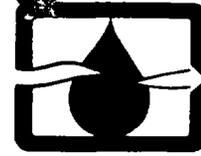
**SUCTION COVER
 MAIN DRAIN**

2

1

78

HYDRO AIR INDUSTRIES INC.



1317 W. GROVE AVE., ORANGE, CA. 92665 ■ 714/974-1920

September 28, 1995

U.S. Consumer Product Safety Commission
Division of Corrective Actions
4330 East West highway
Bethesda, Md. 20814-4408

Attn: Judith Hayes

Re: Your letter dated September 20, 1995
CPSC RP90116

Dear Ms. Hayes,

We appreciate you forwarding your technical staff's review of the issue of hair weight as it applies to the Hair Entrapment Test described in the ASME / ANSI A112.19.8M-1987 Standard.

The current issue revolves around the sample size of hair used in the test. The current national standard, which we followed when testing the fitting in question, and which we follow for all our testing of suction fittings, calls out a sample size of 2 ounces. The testing performed on your behalf used a sample size, much larger than that called out in the current national standard, which yielded results significantly different from our own.

Your letter restates the position you ascribed during our conference call a few months ago. Our position at that time was and continues to be a commitment to safety. The CPSC is in charge. We will do whatever the commission compels. Hydro Air has a history of cooperation with CPSC as well as a strong commitment to safety, and will do nothing to change the philosophy of cooperation and safety.

We will also continue to express our opinions and concerns.

It is my opinion that the current national standard should be used as the guideline for testing and evaluating the safety of any change we make to our P/N 10-6200. Arbitrarily changing the protocol without sufficient testing and documentation is inappropriate.

During our conference call, we expressed concern that the rules of the game seemed to be changing without strong reason. The hair sample size has been the same since 1982 or 1983 without need for change. Suddenly, for no apparent reason, there was call for change - significant change. We also expressed concern that if the rules were going to change, we wanted to know what the new rules were and that they would apply to all involved in the industry. To date CPSC has mentioned "it may be that more emphasis should be given to the amount (length and weight) of hair which is exposed to the suction force of the drain", but has not stated what the sample size must be. This leaves Hydro Air

subject to rules that are more stringent than others have faced or may face and also leaves the rules open to the whim and whimsy of those in power at CPSC at any given time. This situation must be reconciled before CPSC can mandate a hair sample size requirement.

I have concerns about the methodology used to determine your sample size estimate.

1. The work done by the Directorate for Epidemiology and Health Sciences seems to assume that the sample size required by the standard represents an entire head of adult hair. In my opinion, this is not the case. I interpret the sample size to represent a "Pony Tail" on a young (pre teen to early teen) person - characteristically those involved in entrapment / entanglement accidents.
2. I am concerned by the correlation / equating a sample size which represents a "Pony Tail", with the total hair mass present.

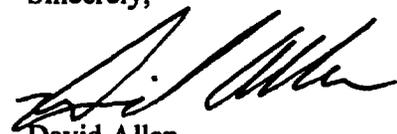
The estimate of 300 grams (10.58 ounces) for sample size represents the entire head / scalp of hair for an adult female. Again, in my opinion, the sample size is meant to represent a "Pony Tail" on a young (pre teen to early teen) person - characteristically those involved in entrapment / entanglement accidents, not an entire head of hair. It is therefore incorrect to assume that the weight / size of hair sample should be 300 grams (10.58 ounces). It is also incorrect to use the 300 grams to determine a "column diameter" for the sample size.

3. The statement from the IDIs describing the victims hair length as either "very long", "waist length hair" or "measuring about 18 inches maximum", I believe are interpreted by EH as referring to an adult woman's physiology. Again the statements should be taken in context of the physiology of a young (pre teen to early teen) person - characteristically those involved in entrapment / entanglement accidents, not adults.

In closing, I want to reiterate that we at Hydro Air want to and will cooperate to the fullest extent with CPSC. We do not, however wish to do so blindly. We wish to be involved in positive dialog to assure proper test methodology which assures user safety without undue burden on any party involved.

Thank you for taking the time to review this letter. I look forward to your response.

Sincerely,



David Allen
V.P. Manufacturing

c: Jerry Moreland
Darrell Crosby



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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

VIA FAX

SEP 21 1995

Dave Allen
Vice President, Manufacturing
Hydro Air Industries, Inc.
1317 W. Grove Avenue
Orange, CA 92665
FAX (714) 974-5371

RE: CPSC RP940116
Hydro Air Industries, Inc.
Model 10-6200 Suction Fitting

Dear Mr. Allen:

Consistent with our on-going discussion of the appropriate test procedures concerning the potential hazard of hair entrapment, I am submitting a copy of our technical staff's review of the issue of hair weight as it applies to the ASME/ANSI Hair Entrapment Test (112.19.8M-1987). As you will note, the conclusion is that the current required hair weight of 2 ounces does not appear to be representative of actual victims' hair weight. More specifically, it is estimated the average weight of scalp hair of an adult female is 10.58 ounces, significantly more than that required by the standard.

Please review this information so that we may decide what actions Hydro Air should take to appropriately address the potential risk of hair entrapment that appears to be presented by suction fitting model 10-6200. Your written response within 10 days of receipt of this correspondence would be appreciated.

Sincerely,

Judith Hayes
Compliance Officer
Division of Corrective Actions
(301) 504-0608, extension 1355

Enclosure

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Division of Administrative Litigation

William J. Moore
Trial Attorney
Tel: (301) 504-0626, Ext. 1348
Fax: (301) 504-0359

August 7, 1995

Patrick J. Higgins, President
P.J. Higgins & Associates, Inc.
305 East Patrick Street
PO Box 3929
Frederick, MD 21701-0908

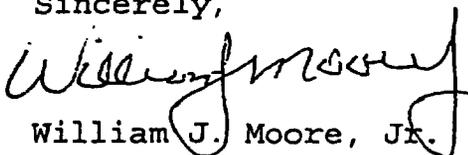
Dear Mr. Higgins:

Thanks to you and your subcommittee for inviting the staff to attend your ANSI/ASME meeting to discuss suction cover hair entrapment issues on July 26, 1995.

Enclosed please find a copy of the guidelines used by CPSC staff when investigating safety related incidents involving spas, hot tubs and whirlpools. We welcome any comments and suggestions your committee may have about the type of information we try to collect during our investigation. I regret the delay in providing this guideline. I was under the impression that John O'Connor had sent it to you following our first meeting with your subcommittee.

The work your group does to address the safety of suction covers is very important and we wish you success in reducing or eliminating drownings and near drownings associated with these components.

Sincerely,


William J. Moore, Jr.

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Dave Allen
 Vice President, Manufacturing
 Hydro Air Industries, Inc.
 1317 W. Grove Avenue
 Orange, CA 92665

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PS Form 3811, December 1991 * U.S.G.P.O. : 1992-307-530

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Dave Allen
Vice President, Manufacturing
Hydro Air Industries, Inc.
1317 W. Grove Avenue
Orange, CA 92665

Re: CPSC RP940116
Hydro Air Industries, Inc.
Model 10-6200 Suction Fitting

Dear Mr. Allen:

The staff of the Office of Compliance and Enforcement of the U.S. Consumer Product Safety Commission (Commission) has reviewed the available information concerning the above-mentioned case.

After careful consideration and in accordance with 16 C.F.R. § 1115.12(a), the Compliance staff has made a preliminary determination that Model 10-6200 Suction Fitting presents a substantial product hazard as defined by section 15(a) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2064(a). Specifically, the use of the model 10-6200 suction fitting in spas, hot tubs, and whirlpools may result in hair entrapment.

The staff welcomes and will give full consideration to any comments or additional information from the firm concerning its preliminary determination. The staff will meet with the firm as necessary to discuss its comments or corrective action.

Voluntary Corrective Actions

The staff acknowledges that the firm proposes to take voluntary action to address this potential hazard. Please submit

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