



**UNITED STATES
 CONSUMER PRODUCT SAFETY COMMISSION
 4330 EAST WEST HIGHWAY
 BETHESDA, MD 20814**

This document has been electronically approved and signed.

BALLOT VOTE SHEET

Date: September 12, 2012

TO : The Commission
 Todd A. Stevenson, Secretary

THROUGH: Kenneth R. Hinson, Executive Director
 Cheryl A. Falvey, General Counsel

FROM : Patricia M. Pollitzer, Acting Assistant General Counsel, RAD

SUBJECT : Petition PP11-1; Torch Fuel and Lamp Oil Petition

BALLOT VOTE DATE: September 18, 2012

Staff is forwarding to the Commission a briefing package concerning a petition (PP11-1) submitted by Betsy Bumpas requesting that the Commission initiate rulemaking to require that torch fuel and lamp oil be packaged in non-see-through containers. The staff recommends that the Commission deny the petition.

Please indicate your vote on the following options:

I. Grant Petition PP 11-1.

 Signature Date

II. Deny Petition PP11-1 and direct staff to draft a letter of denial to the petitioner.

 Signature Date

III. Defer decision on Petition PP11-1.

Signature

Date

IV. Take other action (please specify):

Signature

Date



Briefing Package

Torch Fuel and Lamp Oil Petition

September 11, 2012

For Additional Information, Contact

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ATTACHMENTS

TAB A	Petition to initiate rulemaking to require that torch fuel and lamp oil be packaged in non-see-through containers (PP 11-1), May 9, 2011.
TAB B	<u>Federal Register</u> Notice, July 26, 2011, soliciting comments <u>Federal Register</u> Notice, October 17, 2011, soliciting comments
TAB C	Memorandum from Craig W. O'Brien, Directorate for Epidemiology, Hazard Analysis Division, "Injuries and Deaths Associated with Pediatric Torch Fuel and Lamp Oil Exposures," January 2000 through July 2011," December 12, 2011.
TAB D	Memorandum from Adrienne R. Layton, Ph.D., Directorate for Health Sciences, "Torch Fuel and Lamp Oil Hazards," January 6, 2012.
TAB E	Memorandum from Sharon R. White, Directorate for Engineering Sciences, Division of Human Factors, "Human Factors Analysis of the Torch Fuel and Lamp Oil Petition," January 26, 2012.

- TAB F Memorandum from Gregory K. Rea, Directorate for Laboratory Sciences, Division of Mechanical Engineering, “Review of Non-Citronella Torch Fuel and Lamp Oil Consumer Packaging Requirements,” February 9, 2012.
- TAB G Memorandum from Samantha Li, Directorate for Economic Analysis, “Petition on Torch Fuel and Lamp Oil: Market Information and Economic Considerations,” January 24, 2012.
- TAB H Public Comments in Response to Petition PP 11-1.

Executive Summary

On May 13, 2011, the U.S. Consumer Product Safety Commission (CPSC or Commission) received a letter from Betsy Bumpas, petitioning the Commission to initiate rulemaking to require that torch fuel and lamp oil be packaged in non-see-through containers. Specifically, the petitioner asserts that certain petroleum distillates, including torch fuel and lamp oil, as currently packaged, resemble apple juice and other juices. The petitioner states that because young children enjoy the taste of juice and are accustomed to drinking it regularly, packaging petroleum distillates in clear plastic bottles poses a risk of injury to children because children may mistake them for juice. The petitioner suggests packaging the fuel in solid-colored or opaque plastic child-resistant containers or metal containers, to make it impossible for a child to see the fuel when packaged. To support the claim that the requested action is necessary, the petitioner provided injury data obtained from the New Jersey Poison Information and Education System and from a 2002 through 2009 Annual Report of the American Association of Poison Control Center's National Data System. Additionally, the petitioner cited an incident involving her son, age 2, stating that he saw a partially empty, clear bottle of torch fuel, thought the product was juice, and ingested it. He died at a hospital within a few hours of ingesting the torch fuel. On July 7, 2011, the CPSC's Office of the General Counsel docketed the request as petition PP-11-1 under the Poison Prevention Packaging Act (PPPA).

Torch fuel and lamp oil, which contain 10 percent or more by weight of petroleum distillates and have a viscosity of less than 100 Saybolt universal seconds (SUS) at 100° F, are required by regulations issued under the PPPA to be in special packaging (*i.e.*, child-resistant and senior-friendly packaging). The PPPA does not cover citronella-based torch fuel and lamp oil. Additionally, the PPPA does not authorize the Commission to prescribe specific packaging designs (15 U.S.C. 1472(d)). However, in the case of a household substance for which special packaging is required, the Commission may prohibit the packaging of such substances in packages that the Commission determines are “unnecessarily attractive to children.”(Id.) Therefore, to issue a rule requiring that torch fuel and lamp oil not be packaged in see-through containers, the Commission would need to determine that see-through containers are unnecessarily attractive to children.

There is no statutory definition of “unnecessarily attractive” to children. However, given the petitioner's request to require that torch fuel and lamp oil not be packaged in see-through containers in favor of non-see-through containers, staff considers “unnecessarily attractive” in this case to mean that see-through containers are more attractive than non-see-through containers. The primary issue to consider then is whether see-through containers are unnecessarily attractive to children. This briefing package provides the Commission with the available information to address this issue.

Staff searched the CPSC databases for incidents related to torch fuel and lamp oil for the periods, January 2000 through July 2011. Staff identified 42 in-scope reported incidents. Staff also found 253 in-scope torch fuel and lamp oil-related cases in the National Electronic Injury Surveillance System (NEISS). Based on these cases, staff estimated a total of 8,500 emergency department-treated injuries. Staff further reviewed a summary report of data tracked by the American Association of Poison Control Centers (AAPCC). Based on AAPCC's annual reports,

the National Poison Data System's (NPDS) data for 2006–2010 contains four pediatric poisoning fatalities due to lamp oil ingestion.

In the vast majority of the cases, there is insufficient information to indicate whether poisoning ingestions occurred from the original packaging or from sources other than the original packaging. However, in the cases specifying the source of the ingestion, in only one instance does the data indicate that the container was a clear plastic bottle. In most cases, though, reports indicate that children accessed the product from containers other than the original bottle, such as a lamp, candle, or torch. These incidents are not addressed in the petition. Several published studies corroborate staff's findings.

Additionally, the behavior of children in the at-risk age group may put them at risk for ingesting products hidden from view in non-see-through packaging. The published research related to other products suggests that children may ingest torch fuel and lamp oil from non-see-through packaging. The research does not indicate at what rate children ingest from non-see-through compared to see-through containers.

Therefore, a rule that would prohibit packaging of torch fuel and lamp oil in see-through containers would likely have limited impact. Staff believes that reducing the likelihood of poisoning due to ingestion of torch fuel and lamp oil lies in reducing the potential for children to access these substances from secondary containers other than the original bottle packaging.

Staff recommends that the Commission deny the petition. Although there is a risk of serious injury and death from children ingesting torch fuel and lamp oil, the available information indicates that the resulting rule that would prohibit these substances from being packaged in see-through containers would likely have limited impact. Staff is aware of only one reported incident where the product was in the original container and the container involved was see-through. Without such data, the staff cannot determine that see-through packaging for torch fuel and lamp oil is more attractive to children than non-see-through containers. The incident data indicates that the larger problem is with ingestions of torch fuel and lamp oil from containers or sources other than the original packaging.

The Commission could direct the staff to obtain additional injury data for further analysis. However, there are a number of study limitations, as discussed in the briefing package memo, which may preclude obtaining the additional information necessary to determine whether see-through containers are unnecessarily attractive.



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Memorandum

Date: September 11, 2012

TO : The Commission
Todd A. Stevenson, Secretary

THROUGH: Cheryl A. Falvey, General Counsel
Kenneth R. Hinson, Executive Director
Robert J. Howell, Deputy Executive Director for Safety Operations

FROM : DeWane Ray, Assistant Executive Director,
Office of Hazard Identification and Reduction
Sharon R. White, Project Manager,
Division of Human Factors, Directorate for Engineering Sciences

SUBJECT : Torch Fuel and Lamp Oil Petition

Staff of the U.S. Consumer Product Safety Commission (CPSC or Commission) has prepared this briefing package in response to a petition requesting that the Commission initiate rulemaking to require that torch fuel and lamp oil be packaged in non-see-through containers.

I. Background

On May 13, 2011, the Commission received a letter from Betsy Bumpas, petitioning the Commission to initiate rulemaking to require that torch fuel and lamp oil be packaged in non-see-through containers (Tab A). Specifically, the petitioner asserts that certain petroleum distillates, including torch fuel and lamp oil, as currently packaged, resemble apple juice and other juices. The petitioner states that because young children enjoy the taste of juice and are accustomed to drinking it regularly, packaging petroleum distillates in clear plastic bottles poses a risk of injury to children because children may mistake it for juice. The petitioner suggests packaging the fuel in solid-colored containers, or opaque plastic child-resistant containers, or metal containers to make it impossible for a child to see the fuel when packaged. On July 7, 2011, the CPSC's Office of the General Counsel docketed the request as petition PP-11-1 under the Poison Prevention Packaging Act (PPPA)(15 U.S.C. § 1471 et seq).

The petitioner maintains that there are many deaths and injuries due to the accidental ingestion of fuels that resemble juice packaged in clear plastic bottles. She relates that "the New Jersey Poison Information and Education System stated in June of 2008 that 4 people were hospitalized, 1 was critically ill, and 1 killed due to torch oil being mistaken for apple juice." The petitioner also states that "from 2002 through 2009 the Annual Report of the American

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Association of Poison Control Centers' National Poison Data System has chronicled the exposure of many young children to lamp oils, which includes torch fuels.” The petitioner further cites an incident involving her son when he was celebrating his second birthday at a park on June 9, 2009. The petitioner states that her son saw a partially empty, clear bottle of torch fuel,^{1,2,3} thought the product was juice, and ingested it. He died at a hospital within a few hours of ingesting the fuel.

On July 26, 2011, the Commission published a *Federal Register* notice, soliciting public comments on the petition (Tab B). The comment period closed on September 26, 2011. The Commission received a total of 259 comments. Most of the comments were submitted by consumers. Five comments were submitted by representatives of poison control centers. Four comments were submitted by representatives of law firms. Nine comments were submitted by representatives of other interested organizations. One comment was submitted by counsel representing the petitioner, and one was submitted by a dominant manufacturer of lamp oil. Counsel representing the petitioner requested an extension of the comment period. The Commission granted counsel's request, and on October 17, 2011, we published a *Federal Register* notice, reopening the comment period (Tab B). The second comment period closed on November 16, 2011. The Commission received a total of 17 additional comments. All comments received during the extended period, except for one, came from consumers. One came from a representative of a law firm. In total, the Commission received 276 comments (Tab H). Staff categorized and summarized the issues raised by the comments. Staff's responses to issues raised by the commenters are provided in the briefing package memo.

Torch fuel and lamp oil are petroleum-based products that are a specific class of hydrocarbons refined from crude oil. Petroleum distillates include: gasoline, naphtha, mineral spirits, kerosene, and paraffin oil. Torch fuel is designed specifically to provide fuel for torches and is used to illuminate outdoor festivities. Lamp oil is a product that is designed to burn in oil lamps, torches, and lanterns.

The Commission currently regulates torch fuel and lamp oil under both the PPPA and the Federal Hazardous Substances Act (FSHA). (15 U.S.C. § 1261 et seq). Lamp oil and torch fuel are also required by 16 CFR § 1700.14(a)(7) to be in special packaging (child-resistant and senior-friendly packaging).⁴ Under the FSHA, torch fuel and lamp oil must display appropriate hazard warnings, including: “Keep out of the reach of children.” (15 U.S.C. § 1261(p)).⁵ The petitioner is requesting additional packaging requirements.

As stated earlier, this petition is docketed under the PPPA. The PPPA does not authorize the Commission to prescribe specific packaging designs. (15 U.S.C. § 1472(d)). However, in the case of a household substance for which special packaging is required, the Commission may

¹ The petitioner's son ingested citronella-based torch fuel. Citronella is an insect repellent and is subject to the Environmental Protection Agency's (EPA) requirements, and therefore, is not under the CPSC's jurisdiction. The staff's analysis is limited to packages for non-citronella-based torch fuel and lamp oil.

² <http://www.epa.gov/opprd001/crp/>.

³ <http://www.epa.gov/oppsrd1/REDs/factsheets/3105fact.pdf>.

⁴ The PPPA authorizes the Commission to issue requirements that these substances be in special packaging. (15 U.S.C. § 1472(a)).

⁵ The FSHA authorizes the Commission to issue cautionary label requirements. (16 CFR § 1500.121).

prohibit the packaging of such a substance in packages that the Commission determines are “unnecessarily attractive to children.” (Id). Therefore, to issue a rule requiring that torch fuel and lamp oil not be packaged in see-through containers, the Commission would need to determine that see-through containers are unnecessarily attractive to children.

II. Discussion

A. Incident Data

CPSC Data

The memo at Tab C discusses CPSC staff’s review of incidents involving pediatric torch fuel and lamp oil exposures. The review notes whether the source of the torch fuel and lamp oil was an original bottle, a source other than the original bottle, or an unknown source because it is possible that the unknown cases are actually original bottle cases. This is important because the rule that the petitioner requests would only address ingestions when the child accessed the original bottle.

CPSC staff reviewed incidents involving pediatric torch fuel and lamp oil exposures that occurred from January 2000 through July 2011. Staff identified 42 incidents obtained from the Injury and Potential Injury Incident (IPII), in-depth investigations, and death certificate databases that are within the scope of the petition. In-scope incidents include those that involved ingestion of, or chemical burns from, torch fuel or lamp oil not containing citronella or other pesticides, regardless of whether they are related to the original packaging. The 42 reported incidents include 31 incidents that were investigated by staff as part of routine In-Depth Investigation (IDI) work. Staff assigns investigations for all serious injuries and deaths from lamp oil and torch fuel ingestions.

Thirty-nine of the 42 (93%) incidents involved children younger than age 3 years. Four of the 42 incidents involved a death. Of the 42 incidents, 14 (33%) involved the original bottle; 20 (48%) involved a source other than the original bottle; and 8 (19%) had insufficient information to determine whether the product came from the original bottle. Even in cases where the original bottle was identified as the source, in all but one case, information was insufficient to determine whether the bottle was of a clear design. In the one case where there was sufficient information, the bottle involved in the incident was a clear plastic bottle. Thus, although staff assigns investigations for all serious injuries and deaths from lamp oil and torch fuel ingestions, the information in 13 of the 14 incidents is insufficient to determine whether the original bottle packaging was of a clear design. The rule the petitioner requests would address only incidents in which the torch fuel or lamp oil was packaged in an original clear bottle and the child gained access to the container.

Staff also identified 253 in-scope NEISS cases. These incidents were reported to the CPSC from the years 2000 through 2010. Based on these cases, staff estimated a total of 8,500 emergency department-treated injuries during the 11-year period. The 253 cases provide insufficient information to support annual estimates or estimates of the source of the the lamp oil. However, based on information from the 253 incidents, 20 (8%) incidents involved access to the

original bottle; 67 (26%) incidents involved access from a source other than the original bottle; and in 166 (66%) cases, there was insufficient information to determine whether the product came from the original bottle. Even in those cases where the original bottle was identified as the source, information was insufficient in every one of the 20 incidents to determine whether the bottle was of a clear design.

Additional Information

Staff reviewed a summary report of data tracked by the AAPCC. Based on the AAPCC's annual report, the NPDS data for a 5-year period from 2006 to 2010 contains four pediatric poisoning fatalities due to lamp oil ingestion. The NPDS data does not contain information on the container from which the substance was obtained.

Petitioner's Injury Data

As stated previously, the petitioner provided data that she obtained from the New Jersey Poison Information and Education System and a 2002 through 2009 Annual Report of the American Association of Poison Control Centers National Poison Data System (NPDS): 27th Annual Report to support her claim that packaging torch fuel and lamp oil in clear plastic bottles presents a risk to children. Despite the petitioner's submissions, there were no data indicating that the bottles involved in the incidents were clear plastic bottles.

Additionally, the petitioner cites an incident involving the death of her son when he ingested torch fuel. The torch fuel involved in the petitioner's son's death was citronella-based. Citronella is an insecticide and the U.S. Environmental Protection Agency (EPA) sets child-resistant packaging standards for insecticides. Therefore, citronella-based torch fuel and lamp oil is not under the CPSC's jurisdiction. Thus, staff is not able to consider this incident as part of its analysis.

Collection of Additional Injury Data

Given that the injury data are insufficient to determine that clear bottles are involved in the incidents, the question arises of whether it would be possible to obtain that information by collecting additional data. A telephone follow-up study of NEISS cases may be the best way to obtain information on container type since specific questions could be posed during a telephone interview regarding the cases in a survey sample. However, collecting additional data by telephone studies involves a number of drawbacks. The incidents may be out of scope, such as those involving citronella-based torch fuel and lamp oil, which are outside CPSC jurisdiction. Also, the incidents may not be relevant to the question of see-through versus non-see-through packaging if the incidents involved ingestion from secondary packaging or a lamp itself. Additionally, the respondent may not want to discuss the incident or may not even be available to participate. And, if the respondent is available, he/she may not recall enough details to determine the opacity of the container. Further, NEISS has historically provided only 23 in-scope cases a year, of which only about 5 would be expected to involve access from the original container. Given these limitations, it would take years to collect enough NEISS data to generate reasonable estimates for see-through and non-see-through packaging.

As earlier mentioned, AAPCC's NPDS data does not contain information on the container from which the substance is obtained. A study could be done in conjunction with AAPCC, where they would ask extra questions about lamp oil incidents to gather the container information they do not normally collect. AAPCC could provide as many as 1,450 questionnaires in a year. If rates of citronella incidents and non-original container incidents are similar to NEISS data, this would result in about 270 usable cases in a year. Since the consumer is already in contact with the poison control center, and because the incident typically has just happened when a poison control center is called, it should be possible in most cases to collect information on the opacity of the container.

However, even if this was combined with market data collected by staff in the Directorate for Economic Analysis, staff would obtain information only on correlation, not causation. Therefore, staff will not have answered the question of whether see-through containers are unnecessarily attractive. Additional work would be required to obtain that information.

B. Hazards of Torch Fuel and Lamp Oil

Health Effects⁶

As explained in Tab D, hydrocarbon ingestion can cause respiratory, gastrointestinal (GI), or central nervous system (CNS) symptoms. Young children are the population primarily at risk of serious injury and death from ingestion of hydrocarbon-containing liquids, even when the volumes ingested are not very large.

The primary hazard associated with ingestion of lamp oil and torch fuel is aspiration into the lungs, with serious and potentially fatal medical consequences, such as pneumonitis. The risk of aspiration increases with decreased viscosity (thickness, resistance to flow) and decreased surface tension. However, the most important physical property that determines the aspiration hazard of liquid hydrocarbons is viscosity. Because substances such as torch fuel and lamp oil have low-to-intermediate viscosity, they offer less resistance, flow easily, and penetrate into the lower airways. Following ingestion with subsequent aspiration, hydrocarbons may pool in the pulmonary lobes and cause irritation, chemical pneumonitis, ventilation/perfusion abnormalities, inflammation, pneumatoceles, and respiratory failure. Thus, direct aspiration of small amounts of these hydrocarbons into the lungs, or aspiration during vomiting, can result in chemical pneumonia, pulmonary damage, and death.

C. Human Factors Analysis

According to CPSC staff's memo at Tab E, the injury data show that the ingestion of torch fuel and lamp oil primarily involves children younger than 3 years of age. Children in this age group explore through mouthing, have greater mobility and ability to imitate, are very curious, and lack ability to foresee dangers. They are curious about mechanical devices and their increased mobility and fine motor skills allow them to gain access to products stored in packaging, such as screw-top bottles.

⁶ Definitions of medical terms are found in the Glossary of Terms in Tab D.

Children ingest hazardous amounts of a variety of substances that are unpalatable, including liquid products, such as drain cleaners, dishwasher soap, and pesticides. Curiosity about the taste and mouth feel of materials like powders and liquids, and a desire to imitate adult behavior, such as adults drinking, are possible explanations for ingestion. Hunger or thirst may be other reasons why children ingest these substances. With a young child's proclivity to ingest substances they get a hold of, combined with their developmental changes, it is not surprising that most of the ingestions involve children younger than age 3.

As stated earlier, to issue a rule requiring that torch fuel and lamp oil not be packaged in see-through containers, the Commission must determine that the packaging is unnecessarily attractive to children. The rule the petitioner requests is intended to address incidents involving torch fuel or lamp oil packaged in a clear bottle. There is no statutory definition for "unnecessarily attractive" to children. However, given the petitioner's request to require that torch fuel and lamp oil not be packaged in see-through containers in favor of non-see-through containers, staff considers "unnecessarily attractive" in this case to mean that see-through containers are more attractive than non-see-through containers.

In the vast majority of the torch fuel and lamp oil related cases, there is insufficient information to indicate whether poisoning ingestions occurred from the original packaging or from sources other than the original packaging. However, in those cases specifying the source of the ingestion, in only one instance does the data indicate that the container was a clear plastic bottle. In most cases though, children accessed the product from a container other than the original packaging such as a lamp, candle, or torch. A 1984 study that corroborates these findings noted that paraffin oil is rarely ingested from a bottle. Additionally, staff's findings are consistent with a previous 1999 CPSC study of lamp oil ingestions which concluded that, where reports specified the container of the lamp oil, the majority, 54 of 74 (73%) incidents, were due to ingestions of lamp oils from lamps rather than from bottles. Further, a 2009 study that corroborates staff's findings indicates that the majority of the victims in 1996 (68%) and in 2005 (64%) drank oil from an oil lamp. The cites for all of the studies are in the reference section at Tab E.

Further, the behavior of children under age 3 may also lead these children to ingest products hidden from view in non-see-through packaging. As cited in Tab E, published research related to other products suggests that children may ingest torch fuel and lamp oil from non-see-through packaging. The research is based on analyses of hospital admissions due to poisoning ingestions by children under age 5. One study evaluates chemical and plant ingestions and the other corrosive substances such as bleach. Therefore, the resulting rule that would prohibit packaging of torch fuel and lamp oil in see-through packaging would likely have little impact. Staff from the Division of Human Factors (ESHF) believes that reducing the likelihood of poisoning ingestion of torch fuel and lamp oil would lie in reducing the potential for children to access these substances from containers other than the original packaging. Packaging torch fuel and lamp oil in non-see-through packaging may not address most poisoning ingestion incidents.

Staff could collect additional injury data. Staff would need to analyze the data to compare the percentage of incidents involving clear containers to the total percentage of containers on the market that are clear. This ingestion percentage from clear containers would then have to be

compared to that same calculation for non-see-through containers. If staff determines that the percentage of incidents involving clear containers is significantly greater than that for non-see-through containers, then a reasonable basis exists to conduct research to investigate whether see-through packaging is unnecessarily attractive to children. A search of the current scholarly literature produced no relevant studies.

Even if staff could show that see-through containers are unnecessarily attractive, a rule that would prohibit packaging of torch fuel and lamp oil in see-through packaging would likely have limited impact on torch fuel and lamp oil ingestion incidents.

D. Mandatory and Voluntary Standards

In the memo at Tab F, staff reviewed the current mandatory and ASTM voluntary standards potentially relevant to the packaging of non-citronella-based torch fuel and lamp oil. In addition to regulations under the PPPA, there are four mandatory and four voluntary standards that may be relevant. Lamp oil and other fuels are required to be packaged in black opaque containers in the European Union (Regulation 1272/2008 Annex I, Amendment May 28, 2009) to make the packaging less likely to attract children and to prevent these products from being mistaken for drinks. However, none of the other current mandatory or voluntary standards place restrictions on the design of non-citronella-based torch fuel and lamp oil packages.

E. Market Information and Economic Considerations

As discussed in Tab G, the Directorate for Economic Analysis provided information on the market for torch fuel and lamp oil. At least 10 firms are known to be domestic manufacturers of torch fuel and lamp oil. One domestic firm dominates the market. This firm manufactures citronella-based torch fuel and produces multiple brands and products of non-citronella-based fuel, including paraffin lamp oil. As previously stated, citronella is regulated by the EPA. At least nine firms supply lamp oil, two firms manufacture paraffin oil, and four firms manufacture kerosene. Publicly available information is insufficient to identify the size and dollar sales of most of these firms. At least two foreign firms manufacture citronella used for outdoor torches and lamps, but, as noted previously, these products would not be under CPSC jurisdiction. However, it is unknown whether these foreign products are imported into the United States.

One firm specializes in distributing torch fuel for the retail market. Product sizes range from 30 ounces to 55-gallon drums. Prices range from \$7.50 to \$920, depending on the size and quantity. This retailer also supplies torch fuel containing eucalyptus and citronella and lamp oil.

Paraffin oil is sold in several sizes. Retail prices depend on the brand and package size. Prices for pint sizes range from \$5.37 to \$7.50. Prices for quart sizes range from \$10.80 to \$11.00. The largest size, 2.5 gallons, is \$110.

Retail prices for kerosene vary, depending on the size. Prices for quart-size containers range from \$4.99 to \$23.17. Prices for gallon-size containers range from \$9.79 to \$10.99. Firms may offer online discounts for shipping and quantity.

F. Public Comments

The Commission received a total of 276 comments. Most of the comments were submitted by consumers. Five comments were submitted by representatives of poison control centers. Four comments were submitted by representatives of law firms. Nine comments were submitted by representatives of other interested organizations, including IOWA Hospice, Red Rock Video Services, LLC, and Tahlequah Orphan and Adoption Ministries. One comment was submitted by counsel representing the petitioner, and one was submitted by a dominant manufacturer of lamp oil. Staff categorized and summarized the issues raised by the commenters. Two hundred and seventy-five comments support the petition. One comment, which was submitted by the dominant manufacturer, indicates that it “does not oppose the Commission initiating rulemaking to consider whether to require non-see-through containers for torch fuel and lamp oil.” However, it points to the mandates of the PPPA and indicates that if the Commission determines to propose a rule, a rule “simply prohibiting the packaging of torch fuel and lamp oil in clear . . . containers would adequately address the matter.” All 276 comments can be found at Tab H. A summary of the comments and staff’s responses are provided below:

Packaging

- 1. Torch fuel and lamp oil containers are very similar in appearance and shape to juice containers. Because children frequently consume juice and other non-juice drinks, packaging torch fuel and lamp oil in clear plastic bottles poses a risk of injury to children who may mistake it for juice. Therefore, the Commission should require a rule to mandate that torch fuel and lamp oil be packaged in non-see-through containers to hide these products from the view of children to reduce the likelihood of injury and death. Placing these products in opaque, solid, or metal containers will substantially reduce the likelihood that a child would see the liquid and consume it. Additionally, placing these products in containers that are unattractive to a child will dissuade a child from wanting to drink them.**

Staff Response

Section 3(d) of the Poison Prevention Packaging Act (PPPA) (15 U.S.C. §1472(d)) prohibits the Commission from prescribing specific packaging designs; however, this section does allow the Commission to prohibit the packaging of household substances in special packages that the Commission determines are unnecessarily attractive to children. In this case, to prohibit torch fuel and lamp oil from being packaged in see-through containers, the Commission would need to determine that see-through containers for these products are unnecessarily attractive to children. However, the information currently available is not sufficient to determine that these ingestions involved see-through containers. Staff could collect additional injury data to obtain this information.

However, as explained earlier, there are a number of study limitations that may preclude obtaining the additional information necessary to determine whether see-through containers are unnecessarily attractive. Moreover, packaging torch fuel and lamp oil in non-see-through containers may not address most poisoning ingestion incidents because in most of these

incidents, children accessed the product from sources other than from the original packaging. Further, children in the at-risk age group exhibit behaviors such as excessive mouthing, high mobility and curiosity, which may also lead young children to ingest products hidden from view in non-see-through packaging. Therefore, staff believes that reducing the likelihood of death and injury from ingestion of torch fuel and lamp oil may lie in reducing the potential for children to access these substances from containers other than the original packaging.

- 2. One commenter, CPSC-2011-0048-0231, states that the firm embraces reasonable standards that improve child safety, and it does not oppose the Commission initiating rulemaking to consider whether to require non-see-through containers for torch fuel and lamp oil. Further, the commenter states that the Poison Prevention Packaging Act does not authorize the Commission to prescribe specific packaging designs and that in the case of household substances for which special packaging is required, the Commission may prohibit the packaging of such substances in packages that it determines are unnecessarily attractive to children, if certain additional requirements are met, including feasibility, practicability, and appropriateness for the substance. Moreover, the commenter states that should the Commission propose such a rule, the proposed rule should simply prohibit the packaging of torch fuel and lamp oil in clear or transparent containers.**

Staff Response

The commenter is correct that the Commission may not prescribe special packaging designs, but it may prohibit packaging that the Commission determines is unnecessarily attractive to children. We note also that the PPPA does not prohibit the industry from creating voluntary standards for the packaging of torch fuel or lamp oil that would address the concerns raised in the petition.

Effective Date

- 3. If the Commission decides to issue a rule prohibiting see-through containers, commenter CPSC-2011-0048-0231 requests that the Commission establish an effective date no sooner than 1 year from the date the rule is promulgated.**

Staff Response

Staff is not recommending adoption of any rule. However, if the Commission were to grant the petition and proceed with rulemaking that would require torch fuel be packaged in non-see-through packaging, staff would need to solicit comments from the impacted industries in order to recommend an effective date.

Product Content

4. Torch fuel and lamp oil should not be colored and scented to resemble apple juice, other juice, or other non-juice-flavored drinks so that children are not confused.

Staff Response

Section 3(d) of the PPPA prohibits the Commission from prescribing product content. As a result, the Commission cannot promulgate any regulation that would specify a given color or scent of a product. Such a requirement could be addressed under a voluntary standard rather than a CPSC-mandated standard. Between January 1, 1993 and December 31, 1998, a series of 52 IDIs were by conducted by telephone or on site. In approximately one-half of the ingestion incidents, the lamp oil was reported to be colored or scented.⁷ During the 1999 calendar year, the CPSC contracted with the AAPCC to solicit all AAPCC member centers to participate in a special study of reported lamp oil incidents⁸ in order to examine further the roles of color and scent in lamp oil ingestions. The study included questions on the presence of a brightly colored lamp oil and of a scented lamp oil. The study concluded that the lamp oil involved in children's exposures "was sometimes brightly colored, although more frequently not, and was rarely scented." This study, as well as the telephone study mentioned above, suggests that color and scent do not seem to play a major role in a child's exposure to lamp oil.

Special Packaging

5. Torch fuel and lamp oil should be required to have a child-resistant cap. Another commenter indicates that child-resistant caps are not completely reliable.

Torch fuel and lamp oil, which contain 10 percent or more by weight of petroleum distillates and have a viscosity of less than 100 Saybolt universal seconds at 100° F, are required to have special packaging (also known as child-resistant and senior-friendly packaging) by 16 CFR § 1700.14(a)(7).

Section 2 of the PPPA, 15 U.S.C. § 1471(4), defines "special packaging" as "packaging that is designed or constructed to be significantly difficult for children under five years of age to open or obtain a toxic or harmful amount of the substance contained therein with a reasonable amount of time and not difficult for normal adults to use properly. "Special packaging" does not mean that all such children cannot open or obtain a toxic or harmful amount of a substance within a reasonable amount of time." In other words, child-resistant packaging does not mean that the package is child proof.

Several studies have demonstrated that special packaging saves lives. CPSC staff analyzed child fatality data for unintentional ingestions of oral prescription medicines during the 1964 through 1992 timeframe. The results of the analysis showed that the death rates for oral prescription medicines declined even after taking into account the changes in the consumption of

⁷ Aitken, Susan C., Division of Health Sciences, February 26, 1999, Subject: Accidental Ingestions of Lamp Oil.

⁸ Morris, C. Craig, Division of Hazard Analysis, August 9, 2000, Subject: Pediatric Lamp Oil Poisonings Associated with Lamps

the medications over time and the long-term decline in the overall unintentional death rate of children from all causes (Rodgers, G. “The Safety Effects of Child-Resistant Packaging for Oral Prescription Drugs, Two Decades of Experience,” *JAMA* 275:1661–1665, 1996). The CPSC study showed that special packaging reduces the oral prescription medicine-related death rate by up to 1.4 deaths per million children under age 5. This represents a reduction in the rate of fatalities of up to 45 percent from levels that would have been projected in the absence of special packaging requirements, and it equates to about 24 fewer child deaths annually (Rodgers, G. “Let’s Welcome a New Generation of Child-Resistant Packaging,” *Contemporary Pediatrics*, 1997 p. 57–72). A similar study of the effectiveness of special packaging of aspirin estimated that special packaging reduced the aspirin-related mortality rate by 34 percent. This equates to about 90 fewer child deaths from aspirin during the 1973–1990 study period (Rodgers, G., “The Effectiveness of Child-Resistant Packaging for Aspirin,” *Arch Pediatr Adolesc Med* 156:929–933, 2002). When combining the statistics for aspirin with those for prescription drugs, CPSC staff estimates that special packaging saved the lives of more than 900 children since the requirements went into effect in the early 1970s. This estimate relates to aspirin and oral prescription medicines only, and it does not include additional lives that may have been saved by special packaging on other products.

Labeling

6. The label and markings on packages of torch fuel need to be changed so that children will not be attracted to the product.

Staff Response

Section 3(d) of the PPPA (15 U.S.C. § 1472 (d)) prohibits the Commission from prescribing labeling, with the exception of the authority granted in section 4(a)(2) of the PPPA (15 U.S.C. § 1473(a)(2)). However, as explained in the next response, the CPSC regulates the cautionary labeling of hazardous substances under the FHSA.

7. The packaging should include a warning label, including a skull and crossbones, to alert users to the dangers of fuel and to indicate that the contents are poisonous.

Staff Response

If a substance meets the definition of a “hazardous substance” under section 2(f) of the FHSA, it must bear the cautionary labeling that is required under section 2(p) of the FHSA. The torch fuel and lamp oil at issue in the petition do meet the definition of “hazardous substance” and are required to have appropriate cautionary labeling. These requirements include displaying the name of the hazardous substance, the signal word “Warning,” a statement of the principal hazard, and the statement “Keep out of the reach of children” on the packaging. The skull and crossbones symbol and the word “poison” are only required for substances that are “highly toxic,” as defined in section 1500.3(c)(i) and section 2(h)(1) of the FHSA.

Neither torch fuel nor lamp oil meets the definition of a “highly toxic substance” under the FHSA (16 CFR § 1500.3(a)(6)(i)).

Injury Data

- 9. Despite the decreasing number of calls placed to U.S. regional poison control centers regarding lamp oil products, serious injuries and deaths after exposure to lamp oils continue to be reported. A review of these cases suggests that children mistake the lamp oil products for juice.**

Staff Response

The commenter did not provide any data. Therefore, staff cannot confirm this claim. Staff's review of NEISS and IPII data indicates that it is difficult to determine if ingestions of lamp oil occur when children access the product from the original container or if they access the product from another source.

III. Options

1. Grant the petition.

If the Commission determines that see-through containers for torch fuel and lamp oil may be unnecessarily attractive to children and that the Commission therefore should initiate rulemaking to prohibit these substances from being packaged in see-through containers, the Commission may grant the petition and initiate rulemaking accordingly.

2. Deny the petition.

If the Commission determines that the available information is insufficient to determine that see-through containers for torch fuel and lamp oil may be unnecessarily attractive to children, then the Commission may deny the petition.

3. Defer decision on the petition.

If the Commission determines that additional information is necessary to decide whether to grant or deny the petition, the Commission may defer action on the petition and direct staff to obtain additional information.

IV. Conclusions and Staff Recommendation

The staff recommends that the Commission deny the petition. To issue a rule prohibiting torch fuel and lamp oil from being packaged in see-through containers, the Commission would need to determine that see-through containers are unnecessarily attractive to children. The information currently available is insufficient to conclude that clear bottle packaging is involved in the incidents. Staff is aware of only one reported incident where the product was in the original container and the container involved was see-through. Without sufficient data, the staff cannot determine that see-through packaging for torch fuel and lamp oil is more attractive to children than non-see-through containers.

Packaging torch fuel and lamp oil in non-see-through containers may not address most poisoning ingestion incidents. Where reported, in most incidents, children accessed the product from containers other than the original bottle, such as a lamp, candle, or torch. As stated above, the staff is aware of only one incident in which a child ingested torch fuel or lamp oil from an original container that was a clear plastic bottle. The staff also believes that because children in the at-risk age group are likely to explore through mouthing, have greater mobility and ability to imitate, and are very curious, they may be attracted to substances even if the substances are in non-see-through containers. The published research related to other products as discussed suggests that children may ingest torch fuel and lamp oil from non-see-through containers. Thus, staff believes that reducing the likelihood of poisoning ingestion of torch fuel and lamp oil would lie in reducing the potential for children to access these substances from containers other than the original bottle packaging.

The Commission could direct the staff to obtain additional injury data for further analysis. However, there are a number of study limitations as discussed in the memo that may preclude obtaining the additional information necessary to determine whether see-through containers are unnecessarily attractive to children.

TAB A

Tulsa Office:
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PATRICK E. CARR¹
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2 - Licensed in Arkansas
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4 - Licensed in Missouri
5 - Licensed in Texas
† A Professional Corporation

Petition PP 11-1

May 9, 2011

CERTIFIED MAIL

U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

RE: In the Matter of the Petition of Betsy Bumpas and Chris Bumpas
Our clients: Chris & Betsy Bumpas, and Jhonethyn Avery Bumpas, Deceased
Our File #: 37282

Dear Court Clerk:

Enclosed please find an original and three copies of the *Petition* regarding the above-referenced matter.

Upon receipt and review of the enclosed Petition, please file these and return the file-stamped copies to our Oklahoma City office in the enclosed self-addressed stamped envelope.

We appreciate your assistance with this matter. If you have any questions or concerns, please advise. Thank you in advance.

Very truly yours,
CARR & CARR, ATTORNEYS



John L. Branum
Attorney at Law
(405) 249-4215 Direct Line
(800) 418-8210 Fax
jbranum@carrcarrokc.com Email

Enclosures

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Received CPSC
2011 MAY 13 A 9:48
Office of the Secretary
FOI

UNITED STATES OF AMERICA
BEFORE THE Consumer Product Safety Commission

In the Matter of the Petition of Betsy
Bumpas and Chris Bumpas, for the
Issuance of Regulation Requiring Special
Packaging for all "Torch Fuel" Substances

Received CPSC
2011 MAY 13 A 9 47
Office of the Secretary
FOI

No. PP 11-1

PETITION

Petitioner, Betsy Bumpas, respectfully petitions, pursuant to 15 U.S.C. § 1474(a), as made applicable in this case by 15 U.S.C. § 1472, that the Consumer Product Safety Commission exercise its authority under 15 U.S.C. § 1472 to amend regulations determining that "torch fuel" requires special packaging in accordance with the standards prescribed by 16 C.F.R. § 1700.15. The recommended amendment is set forth at the conclusion of this Petition.

Introduction

Certain petroleum distillates, as packaged in the United States, look like juices. These include torch fuel and lamp oil that resemble apple juice and other juices. Torch fuel and lamp oil, as currently manufactured and packaged, pose a serious imminent risk to the public, especially young children. These substances need additional special packaging for the following reasons:

- I. It is common knowledge that most young children enjoy the taste of juice and are accustomed to drinking it on a regular basis.
- II. Some petroleum distillates, as currently packaged, such as torch fuel and lamp oil, resemble juice.

For example, the following photograph was taken of two bottles of Island Party Citronella Torch Fuel which is manufactured by HOC Industries and sold by Dollar General Stores; of same type and identical brand as the bottle that killed Petitioner's son.



The following is a picture of a Juicy Juice Bottle sold across America at various major retailers.



III. Manufacturing potentially deadly petroleum distillates such as torch fuel, *in clear plastic bottles*, causes needless danger.

The CPSC should act to prevent manufactures and others from packaging these fuels in clear containers. There are safer, feasible alternatives, such as opaque containers.

IV. Many individuals have been hurt or killed due to the accidental ingestion of fuels that resemble juice, retailed in clear plastic bottles.

For example, the New Jersey Poison Information and Education System stated in June of 2008 that 4 people were hospitalized, 1 was critically ill, and 1 killed due to torch oil being mistaken for apple juice. (See attached Exhibit 1). From 2002 through 2009 the Annual Report of the American Association of Poison Control Centers' National Data System has chronicled the exposure of many young children to lamp oils, which includes torch fuels. Many of these exposures have caused serious injuries and deaths. Additional incidence information is available upon request.

V. Jhonethyn Bumpas was killed due to the above described problem.

Jhonethyn Bumpas celebrated his second birthday party at the Chickasaw National Park near Sulphur, Oklahoma on June 9, 2009. See below photographs taken at the party.



At the campsite, Jhonethyn Bumpas saw the below pictured, partially empty bottle of Island Party Tiki Torch Fuel, thought the product was juice, and ingested it. As you can see below, the fuel looks like apple juice and the bottle is clear.



Jhonethyn Bumpas died within a few hours. The following photograph was taken of Jhonethyn shortly after his death at the hospital:

Location of Incident: Cold Springs CG, Site # 30



- VI. According to experts, in order to reduce the risk of accidental ingestion of fuels by children, it is necessary to “hide” the product from viewing. In other words, the CPSC can prevent future injuries and deaths by requiring manufacturers of petroleum distillates that resemble juice to package all the products in containers that make it impossible to see the product when in the container. Manufacturers should not be permitted to package these substances in clear plastic bottles.

The special packaging described herein is required to protect children from serious personal injury or serious illnesses resulting from ingesting the substance. Special packaging described above is technically feasible, practicable, and appropriate.

Petitioner proposes that the CPSC make a rule change that would require manufacturers of the above referenced substances to package the product in containers that make it impossible to see the fuel when packaged. This could be accomplished by packaging the fuel in a solid colored or opaque plastic child resistant container or a metal container.

The reasons such amendment should be made are as follows: This amendment would require the subject manufacturers to package the substances in containers which hide the fuel from view. This rule change will prevent the injury and death of children by preventing children from being deceived into believing that deadly fuel is juice.

Petitioner is further prepared to participate in the rulemaking herein sought by submission of written materials which are demonstrative of the harm which can be caused without such a rule in place. Further, Petitioner stands prepared to present oral views and arguments if a hearing is held.

Petitioner further requests that the Commission set such hearing or hearings as may be deemed appropriate and in the public interest, and that the Commission give notice thereof in the Federal Register and to petitioner personally by mailing a copy of such notice to petitioner.

Dated: 26th day of April, 2011.



Betsy Bumpas
c/o Carr & Carr Attorneys
1350 S.W. 89th Street
Oklahoma City, OK 73159
Phone: (405) 249-4215
Fax: (800) 418-8210



Attachment



The New Jersey Poison Information & Education System

Serving New Jersey Since 1983

Designated regional poison center
for New Jersey by New Jersey
Department of Health and Senior
Services and the American
Association of Poison Control
Centers

IMMEDIATE RELEASE

**Please distribute to the public; your local radio, magazines and newspapers;
websites; etc.**

Date: June 2008
Contact: Alicia Gambino, MA, CHES
973-972-9280



**4 Hospitalized,
1 Critically Ill, 1 Dead
Torch Lamp Oil Mistaken for Apple Juice**

(Newark, NJ)- Six New Jersey residents became ill recently after ingesting a small amount of torch oil which was mistaken for apple juice. One individual, an elderly woman, died two days after mistaking the lamp oil for apple juice. Earlier in the month an 8 year old girl was hospitalized in critical condition and was placed on a ventilator also after mistaking the torch oil for apple juice. The child survived her illness but will live the rest of her life with damaged lungs.

In four of the 6 cases of lamp oil ingestions reported to New Jersey's Poison Information and Education System occurred when the victim drank the oil, which looks like apple juice, thinking it was apple juice.

According to Bruce Ruck, PharmD. of NJPIES, "It is very important to recognize lamp oil bottles closely resemble juice containers. When accidentally taken by mouth, such lamp oils can enter the lungs causing pneumonia and death. Jugs containing lamp oils must be stored in a locked cabinet away from storage of food and drinks."

There are other poisonous products which look like and come in containers closely resembling juices. It is important for families to lock up all such potentially dangerous products, keep them far from food and educate the entire family on the dangers of these "look-a-likes." The NJPIES website contains a poster representation of other dangerous look a likes, it is found at WWW.NJPIES.ORG

If you suspect a poisoning, call the poison control center for immediate treatment advice as well as for prevention information. Call **1-800-222-1222**, trained medical professionals will provide you with the most up to date emergency treatment advice, and will answer any drug or poison information question you may have.

Remember, Help Is Just A Phone Call Away!
Poison Emergency? Call 1-800-222-1222
Questions about Poisons? Call 1-800-222-1222
Questions about Poison Prevention? Call 1-800-222-1222
Hearing Impaired May Call 1-973-926-8008

located at University of Medicine & Dentistry of New Jersey

140 Bergen Street, Suite G1600, Newark, NJ 07101-1709 Telephone: 973-972-9280 Fax: 973-643-2679
Website: WWW.NJPIES.ORG

TAB B



(9) Evidence of title to the asserted patent(s) or other right to make the claim.

(10) A copy of the United States Patent and Trademark Office (USPTO) file history of each patent, if it is available to the claimant. Indicate whether the patent has been the subject of any interference proceedings, certification of correction request, reexamination, or reissue proceedings at the USPTO, or lapsed for failure to pay any maintenance fee. In addition, the status of all corresponding foreign patents and patent applications and full copies of the same.

(11) Pertinent prior art known to the claimant not contained in the USPTO file, for example, publications and foreign prior art. In addition to the foregoing, if claimant can provide a statement that the investigation may be limited to the specifically identified accused article(s) or process(es) or to a specific acquisition (e.g. identified contract(s)), it may speed disposition of the claim. Claimants are also encouraged to provide information on any ancillary matters that may have a bearing on validity or infringement.

(c) Denial for refusal to provide information. In the course of investigating a claim, it may become necessary for NASA to request information in the control and custody of the claimant that is relevant to the disposition of the claim. Failure of the claimant to respond to a request for such information shall be sufficient reason alone for denying a claim.

§ 1245.203 Incomplete notice of infringement.

(a) If a communication alleging patent infringement or copyright infringement is received that does not meet the requirements set forth in § 1245.202(a), the sender shall be advised in writing by the Agency Counsel for Intellectual Property:

(1) That the claim for infringement has not been satisfactorily presented; and

(2) Of the elements necessary to establish a claim.

(b) A communication, in which no infringement is alleged in accordance with § 1245.202(a), such as a mere proffer of a license, shall not be considered a claim for infringement.

§ 1245.204 Indirect notice of infringement.

A communication by a patent or copyright owner to addressees other than those specified in § 1245.202(a), such as NASA contractors, including contractors operating Government-owned facilities, alleging that acts of infringement have occurred in the

performance of a Government contract, grant, or other arrangement, shall not be considered a claim within the meaning of § 1245.202(a) until such communication meets the requirements specified therein.

§ 1245.205 Processing of administrative claims.

(a) Filing and forwarding of claims. All communications regarding claims should be addressed to: Agency Counsel for Intellectual Property, Office of the General Counsel, National Aeronautics and Space Administration, Washington, DC 20546-0001. If any communication relating to a claim or possible claim of patent or copyright infringement is received by an agency, organization, office, or field installation within NASA, it shall be forwarded to the Agency Counsel for Intellectual Property.

(b) Disposition and notification. The General Counsel, or designee, shall investigate and administratively settle, deny, or otherwise dispose of each claim. When a claim is denied, the Agency shall so notify the claimant or the claimant's authorized representative and provide the claimant with the reasons for denying the claim. Disclosure of information shall be subject to applicable statutes, regulations, and directives pertaining to security, access to official records, and the rights of others.

(c) Termination of claims. If, while an administrative claim for patent or copyright infringement is pending against NASA, the claimant brings suit for patent or copyright infringement against the United States in the Court of Federal Claims based on the same facts or transactions as the administrative claim, the administrative claim shall thereupon be automatically dismissed, with no further action being required of NASA.

Charles F. Bolden, Jr.,
Administrator.
[FR Doc. 2011-18711 Filed 7-25-11; 8:45 am]
BILLING CODE 7510-13-P

CONSUMER PRODUCT SAFETY COMMISSION

16 CFR Part 1700

[Docket No. CPSC-2011-0048]

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

AGENCY: U.S. Consumer Product Safety Commission.

ACTION: Comment request.

SUMMARY: The U.S. Consumer Product Safety Commission ("Commission" or "we") has received a petition (PP 11-1) requesting that the Commission initiate rulemaking to require special packaging for torch fuel and lamp oil to make it impossible to see the product when it is in the container. We invite written comments concerning the petition.

DATES: The Office of the Secretary must receive comments on the petition by September 26, 2011.

ADDRESSES: You may submit comments, identified by Docket No. CPSC-2011-0048, by any of the following methods:

Electronic Submissions

Submit electronic comments in the following way:

Federal eRulemaking Portal: <http://www.regulations.gov>. Follow the instructions for submitting comments.

To ensure timely processing of comments, the Commission is no longer accepting comments submitted by electronic mail (e-mail), except through <http://www.regulations.gov>.

Written Submissions

Submit written submissions in the following way:

Mail/Hand delivery/Courier (for paper, disk, or CD-ROM submissions), preferably in five copies, to: Office of the Secretary, U.S. Consumer Product Safety Commission, Room 502, 4330 East West Highway, Bethesda, MD 20814; telephone (301) 504-7923.

Instructions: All submissions received must include the agency name and petition number for this rulemaking. All comments received may be posted without change, including any personal identifiers, contact information, or other personal information provided, to: <http://www.regulations.gov>. Do not submit confidential business information, trade secret information, or other sensitive or protected information electronically. Such information should be submitted in writing.

Docket: For access to the docket to read background documents or comments received, go to: <http://www.regulations.gov>.

FOR FURTHER INFORMATION CONTACT: Rochelle Hammond, Office of the Secretary, U.S. Consumer Product Safety Commission, Room 820, 4330 East West Highway, Bethesda, MD 20814; telephone (301) 504-6833.

SUPPLEMENTARY INFORMATION: The Commission has received a submission from John L. Branum, Attorney at Law, on behalf of Betsy Bumpas ("petitioner"), dated May 9, 2011, requesting that we initiate rulemaking to require torch fuel and lamp oil to be

packaged in containers that are not see-through. We are docketing this request as a petition under the Poison Prevention Packaging Act ("PPPA"). 15 U.S.C. 1471-1477.

The PPPA authorizes the Commission to issue requirements that certain household substances be sold in child-resistant containers. 15 U.S.C. 1471-1477. Child-resistant packaging requirements currently apply to torch fuel and lamp oil. (More specifically, the child-resistant packaging requirements apply to "kindling and/or illuminating preparations," which includes "cigarette lighter fuel, charcoal lighter fuel, camping equipment fuel, torch fuel, and fuel for decorative and functional lanterns, which contain 10 percent or more by weight of petroleum distillates and have a viscosity of less than 100 Saybolt universal seconds at 100° Fahrenheit." 16 CFR 1700.14(7)). The PPPA does not authorize the Commission to prescribe specific packaging designs for household substances. 15 U.S.C. 1472(d). However, in the case of a household substance for which special packaging, *i.e.*, child-resistant packaging, is required, the Commission may prohibit the packaging of such substance in packages which it determines are unnecessarily attractive to children. Id. Therefore, in order to issue a rule requiring that torch fuel and lamp oil not be sold in see-through containers, the Commission would need to determine that the packaging is "unnecessarily attractive" to children.

Petitioner asserts that certain petroleum distillates, including torch fuel and lamp oil, as currently packaged, resemble juice. Petitioner notes that because young children enjoy the taste of juice and are accustomed to drinking it regularly, packaging petroleum distillates in clear plastic bottles causes needless danger, as children may mistake it for juice.

Petitioner states that "the New Jersey Poison Information and Education System stated in June 2008 that four people were hospitalized, one was critically ill, and one killed due to torch oil being mistaken for apple juice." Petitioner also states that "from 2002 through 2009 the Annual Report of the American Association of Poison Control Centers' National Data System has chronicled the exposure of many young children to lamp oils, which includes torch fuels." Petitioner's son died after ingesting torch fuel from a clear plastic bottle.

While torch fuel and lamp oil are already subject to child-resistant packaging and labeling requirements under the Poison Prevention Packaging Act and the Federal Hazardous

Substances Act, petitioner asserts that additional special packaging is necessary. Specifically, petitioner requests that the CPSC initiate rulemaking "that would require manufacturers of [torch fuel and lamp oils] to package the product in containers that make it impossible to see the product when in the container." Petitioner notes that this could be accomplished "by packaging the fuel in a solid container or opaque plastic child-resistant container or a metal container."

By this notice, we seek comments concerning this petition. Interested parties may obtain a copy of the petition by writing or calling the Office of the Secretary, U.S. Consumer Product Safety Commission, Room 820, 4330 East West Highway, Bethesda, MD 20814; telephone (301) 504-7923.

Copies of the petition are also available for inspection from 8:30 a.m. to 5 p.m., Monday through Friday, in the Commission's Public Reading Room, Room 419, 4330 East West Highway, Bethesda, MD, or from our Web site at <http://www.cpsc.gov>.

Dated: July 18, 2011.

Todd A. Stevenson,

Secretary, U.S. Consumer Product Safety Commission.

[FR Doc. 2011-18512 Filed 7-25-11; 8:45 am]

BILLING CODE 6355-01-P

COMMODITY FUTURES TRADING COMMISSION

17 CFR Chapter I

SECURITIES AND EXCHANGE COMMISSION

17 CFR Chapter II

[Release No. 34-64939; File No. 4-636]

Joint Public Roundtable on International Issues Relating to the Implementation of Title VII of the Dodd-Frank Wall Street Reform and Consumer Protection Act

AGENCIES: Commodity Futures Trading Commission and Securities and Exchange Commission.

ACTION: Notice of roundtable discussion; request for comment.

SUMMARY: On Monday, August 1, 2011, commencing at 9 a.m. and ending at 4 p.m., staff of Commodity Futures Trading Commission ("CFTC") and Securities and Exchange Commission ("SEC") (each, an "Agency," and collectively, the "Agencies") will hold a

public roundtable meeting at which invited participants will discuss various international issues related to the implementation of Title VII of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

DATES: The public roundtable meeting will be held on Monday, August 1, 2011.

ADDRESSES: The roundtable discussion will take place in the Conference Center at the CFTC's headquarters, Three Lafayette Centre, 1155 21st Street, NW., Washington, DC. The discussion will be open to the public with seating made available on a first-come, first-served basis. Members of the public may also listen to the meeting by telephone. Call-in participants should be prepared to provide their first name, last name and affiliation. The information for the conference call is set forth below.

- U.S. toll-free: (866) 844-9416.
- International toll: (203) 369-5026.
- Passcode: 4316057.

A transcript of the public roundtable discussion will be published on the CFTC's Web site at <http://www.cftc.gov/PressRoom/Events/2011/index.htm> and on the SEC's Web site at <http://www.sec.gov/news/press/2011/2011-151.htm>.

FOR FURTHER INFORMATION CONTACT: The CFTC's Office of Public Affairs at (202) 418-5080 or the SEC's Office of Public Affairs at (202) 551-4120.

SUPPLEMENTARY INFORMATION: The roundtable discussion will take place on Monday, August 1, 2011, commencing at 9 a.m. and ending at 4 p.m. Members of the public who wish to comment on the topics addressed at the discussion, may do so via:

- Paper submission to David Stawick, Secretary, Commodity Futures Trading Commission, Three Lafayette Centre, 1155 21st Street, NW., Washington, DC 20581, or Elizabeth M. Murphy, Secretary, Securities and Exchange Commission, 100 F Street, NE., Washington, DC 20549-1090; or
- Electronic submission via visiting

<http://comments.cftc.gov/PublicComments/ReleasesWithComments.aspx> and submitting comments through the CFTC's Web site; and/or by e-mail to rule-comments@sec.gov (all e-mails must reference the file number 4-636 in the subject field) or through the comment form available at <http://www.sec.gov/news/press/2011/2011-151.htm>.

All submissions will be reviewed jointly by the Agencies. All comments must be in English or be accompanied by an English translation. All



does not warrant preparation of a regulatory evaluation as the anticipated impact is so minimal. Since this is a routine matter that will only affect air traffic procedures and air navigation, it is certified this proposed rule, when promulgated, would not have a significant economic impact on a substantial number of small entities under the criteria of the Regulatory Flexibility Act.

The FAA's authority to issue rules regarding aviation safety is found in Title 49 of the U.S. Code. Subtitle 1, section 106, describes the authority for the FAA Administrator. Subtitle VII, Aviation Programs, describes in more detail the scope of the agency's authority. This rulemaking is promulgated under the authority described in subtitle VII, part A, subpart I, section 40103. Under that section, the FAA is charged with prescribing regulations to assign the use of the airspace necessary to ensure the safety of aircraft and the efficient use of airspace. This regulation is within the scope of that authority as it modifies controlled airspace at Show Low Regional Airport, Show Low, AZ.

List of Subjects in 14 CFR Part 71

Airspace, Incorporation by reference, Navigation (air).

The Proposed Amendment

Accordingly, pursuant to the authority delegated to me, the Federal Aviation Administration proposes to amend 14 CFR part 71 as follows:

PART 71—DESIGNATION OF CLASS A, B, C, D AND E AIRSPACE AREAS; AIR TRAFFIC SERVICE ROUTES; AND REPORTING POINTS

1. The authority citation for 14 CFR part 71 continues to read as follows:

Authority: 49 U.S.C. 106(g), 40103, 40113, 40120; E.O. 10854, 24 FR 9565, 3 CFR, 1959–1963 Comp., p. 389.

§ 71.1 [Amended]

2. The incorporation by reference in 14 CFR 71.1 of the Federal Aviation Administration Order 7400.9V, Airspace Designations and Reporting Points, dated August 9, 2011, and effective September 15, 2011 is amended as follows:

Paragraph 6005 Class E airspace areas extending upward from 700 feet or more above the surface of the earth.

* * * * *

AWP AZ E5 Show Low, AZ [Modified]

Show Low Regional Airport, AZ (Lat. 34°15'56" N., long. 110°00'20" W.)

That airspace extending upward from 700 feet above the surface within a 6.7-mile

radius of the Show Low Regional Airport and within 3 miles each side of the 038° bearing of the Show Low Regional Airport extending from the 6.7-mile radius to 10 miles northeast of the airport, and within 2.1 miles each side of the 085° bearing of the Show Low Regional Airport extending from the 6.7-mile radius to 7.9 miles east of the airport; that airspace extending upward from 1,200 feet above the surface within an area bounded by a line beginning at lat. 34°35'00" N., long. 109°51'00" W.; to lat. 34°14'00" N., long. 109°22'00" W.; to lat. 33°49'00" N., long. 110°36'00" W.; to lat. 34°08'00" N., long. 110°45'00" W.; thence to the point of beginning.

Issued in Seattle, Washington, on October 6, 2011.

John Warner, Manager, Operations Support Group, Western Service Center

[FR Doc. 2011-26753 Filed 10-14-11; 8:45 am] BILLING CODE 4910-13-P

CONSUMER PRODUCT SAFETY COMMISSION

16 CFR Part 1700

[Docket No. CPSC-2011-0048]

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

AGENCY: U.S. Consumer Product Safety Commission.

ACTION: Comment request.

SUMMARY: The U.S. Consumer Product Safety Commission ("Commission" or "we") has received a petition (PP 11-1) requesting that the Commission initiate rulemaking to require special packaging for torch fuel and lamp oil to make it impossible to see the product when it is in the container. We are announcing a reopening of the comment period for 30 days.

DATES: The Office of the Secretary must receive comments on the petition by November 16, 2011.

ADDRESSES: You may submit comments, identified by Docket No. CPSC-2011-0048, by any of the following methods:

Electronic Submissions

Submit electronic comments in the following way:

Federal eRulemaking Portal: http://www.regulations.gov. Follow the instructions for submitting comments.

To ensure timely processing of comments, the Commission is no longer accepting comments submitted by electronic mail (e-mail), except through http://www.regulations.gov.

Written Submissions

Submit written submissions in the following way:

Mail/Hand delivery/Courier (for paper, disk, or CD-ROM submissions), preferably in five copies, to: Office of the Secretary, U.S. Consumer Product Safety Commission, Room 502, 4330 East West Highway, Bethesda, MD 20814; telephone (301) 504-7923.

Instructions: All submissions received must include the agency name and petition number for this rulemaking. All comments received may be posted without change, including any personal identifiers, contact information, or other personal information provided, to: http://www.regulations.gov. Do not submit confidential business information, trade secret information, or other sensitive or protected information electronically. Such information should be submitted in writing.

Docket: For access to the docket to read background documents or comments received, go to: http://www.regulations.gov.

FOR FURTHER INFORMATION CONTACT:

Rockelle Hammond, Office of the Secretary, U.S. Consumer Product Safety Commission, Room 820, 4330 East West Highway, Bethesda, MD 20814; telephone (301) 504-6833.

SUPPLEMENTARY INFORMATION: In the Federal Register of July 26, 2011 (76 FR 44506), we published a notice, stating that the Commission had received a submission from John L. Branum, Attorney at Law, on behalf of Betsy Bumpas ("petitioner"), dated May 9, 2011, requesting that we initiate rulemaking to require torch fuel and lamp oil to be packaged in containers that are not see-through. The notice explained that we were docketing the request as a petition under the Poison Prevention Packaging Act ("PPPA"). 15 U.S.C. 1471-1477.

The PPPA authorizes the Commission to issue requirements that certain household substances must be sold in child-resistant containers. 15 U.S.C. 1471-1477. Child-resistant packaging requirements currently apply to torch fuel and lamp oil. (More specifically, the child-resistant packaging requirements apply to "kindling and/or illuminating preparations," which includes "cigarette lighter fuel, charcoal lighter fuel, camping equipment fuel, torch fuel, and fuel for decorative and functional lanterns, which contain 10 percent or more by weight of petroleum distillates and have a viscosity of less than 100 Saybolt universal seconds at 100[deg] Fahrenheit." 16 CFR 1700.14(7)). The PPPA does not authorize the Commission to prescribe specific packaging designs for household substances. 15 U.S.C. 1472(d). However, in the case of a

household substance for which special packaging (*i.e.*, child-resistant packaging), is required, the Commission may prohibit the packaging of such substance in packages that it determines are unnecessarily attractive to children. *Id.* Therefore, in order to issue a rule requiring that torch fuel and lamp oil not be sold in see-through containers, the Commission would need to determine that the packaging is “unnecessarily attractive” to children.

The petitioner asserts that certain petroleum distillates, including torch fuel and lamp oil, as currently packaged, resemble juice. The petitioner notes that because young children enjoy the taste of juice and are accustomed to drinking it regularly, packaging petroleum distillates in clear plastic bottles causes needless danger, as children may mistake it for juice.

The petitioner states that “the New Jersey Poison Information and Education System stated in June 2008 that four people were hospitalized, one was critically ill, and one killed due to torch oil being mistaken for apple juice.” The petitioner also states that “from 2002 through 2009 the Annual Report of the American Association of Poison Control Centers’ National Data System has chronicled the exposure of many young children to lamp oils, which includes torch fuels.” The petitioner’s son died after ingesting torch fuel from a clear plastic bottle.

While torch fuel and lamp oil already are subject to child-resistant packaging and labeling requirements under the PPPA and the Federal Hazardous Substances Act, the petitioner asserts that additional special packaging is necessary. Specifically, the petitioner requests that the CPSC initiate rulemaking “that would require manufacturers of [torch fuel and lamp oils] to package the product in containers that make it impossible to see the product when in the container.” The petitioner notes that this could be accomplished “by packaging the fuel in a solid container or opaque plastic child-resistant container or a metal container.”

The notice that we published in the *Federal Register* of July 26, 2011 (76 FR 44506) stated that we invited comments on the petition, and it informed interested parties how to obtain a copy of the petition. The notice indicated that the comment period would close on September 26, 2011.

Recently, counsel representing the petitioner contacted the Commission to request an extension of the comment period. We note that the docket for this proceeding, as of September 28, 2011, contains nearly 260 comments. Thus,

given the interest in this subject, we are reopening the comment period for any interested parties until November 16, 2011.

Interested parties may obtain a copy of the petition by writing or calling the Office of the Secretary, U.S. Consumer Product Safety Commission, Room 820, 4330 East West Highway, Bethesda, MD 20814; telephone (301) 504-7923.

Copies of the petition are also available for inspection from 8:30 a.m. to 5 p.m., Monday through Friday, in the Commission’s Public Reading Room, Room 419, 4330 East West Highway, Bethesda, MD, or from our Web site at: <http://www.cpsc.gov>.

Dated: October 11, 2011.

Todd A. Stevenson,
Secretary, U.S. Consumer Product Safety Commission.

[FR Doc. 2011-26691 Filed 10-14-11; 8:45 am]

BILLING CODE 6355-01-P

DEPARTMENT OF THE INTERIOR

Office of Surface Mining Reclamation and Enforcement

30 CFR Part 915

[Docket No. IA-016-FOR; Docket ID: OSM-2011-0014]

Iowa Regulatory Program

AGENCY: Office of Surface Mining Reclamation and Enforcement, Interior.

ACTION: Proposed rule; public comment period on proposed amendment.

SUMMARY: We, the Office of Surface Mining Reclamation and Enforcement (OSM), are announcing receipt of a proposed amendment to the Iowa regulatory program (Iowa program) under the Surface Mining Control and Reclamation Act of 1977 (SMCRA or the Act). Iowa proposes to revise its regulatory program by updating its adoption by reference of applicable portions of the Code of Federal Regulations. Iowa intends to revise its program to be consistent with the corresponding Federal regulations.

This document provides the times and locations that the Iowa program and proposed amendments to this program are available for your inspection, the comment period during which you may submit written comments on the amendment, and the procedures that we will follow for the public hearing, if one is requested.

DATES: We will accept written comments on the amendment until 4 p.m., c.d.t., November 16, 2011. If requested, we will hold a public hearing

on the amendment on November 14, 2011. We will accept requests to speak at a hearing until 4 p.m., c.d.t., November 1, 2011.

ADDRESSES: You may submit comments, identified by Docket No. IA-016-FOR, by any of the following methods:

- *E-mail:* agilmore@osmre.gov. Include Docket No. IA-016-FOR in the subject line of the message.
- *Mail/Hand Delivery:* Andrew R. Gilmore, Chief, Alton Field Division, Office of Surface Mining Reclamation and Enforcement, 501 Belle Street, Alton, Illinois 62002.
- *Fax:* (618) 463-6470.
- *Federal eRulemaking Portal:* The amendment has been assigned Docket ID: OSM-2011-0014. If you would like to submit comments go to <http://www.regulations.gov>. Follow the instructions for submitting comments.

Instructions: All submissions received must include the agency name and docket number for this rulemaking. For detailed instructions on submitting comments and additional information on the rulemaking process, see the “Public Comment Procedures” heading of the **SUPPLEMENTARY INFORMATION** section of this document.

Docket: For access to the docket to review copies of the Iowa regulations, this amendment, a listing of any scheduled public hearings, and all written comments received in response to this document, you must go to the address listed below during normal business hours, Monday through Friday, excluding holidays. You may receive one free copy of the amendment by contacting OSM’s Alton Field Division; or you can view the full text of the program amendment available for you to read at <http://www.regulations.gov>.

Andrew R. Gilmore, Chief, Alton Field Division, Office of Surface Mining Reclamation and Enforcement, 501 Belle Street, Alton, Illinois 62002. Telephone: (618) 463-6460. E-mail: agilmore@osmre.gov.

In addition, you may review a copy of the amendment during regular business hours at the following location:

Iowa Department of Agriculture and Land Stewardship, Division of Soil Conservation, Mines & Minerals Bureau, 502 E. 9th Street, Henry A. Wallace Building, Des Moines, Iowa 50319. Telephone: (515) 281-5347.

FOR FURTHER INFORMATION CONTACT: Andrew R. Gilmore, Chief, Alton Field Division. Telephone: (618) 463-6460. E-mail: agilmore@osmre.gov.

SUPPLEMENTARY INFORMATION:

- I. Background on the Iowa Program
- II. Description of the Proposed Amendment
- III. Public Comment Procedures

TAB C



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MARYLAND 20814

Memorandum

Date: December 12, 2011

TO : Sharon R. White, Engineering Psychologist,
Division of Human Factors

THROUGH: Kathleen Stralka, Associate Executive Director,
Epidemiology Directorate

Stephen Hanway, Division Director
Hazard Analysis Division

FROM : Craig W. O'Brien, Mathematical Statistician
Hazard Analysis Division

SUBJECT : Injuries and Deaths Associated with Pediatric Torch Fuel and Lamp
Oil Exposures, January 2000 through July 2011

U.S. Consumer Product Safety Commission (CPSC) staff searched CPSC databases for incidents related to pediatric torch fuel and lamp oil exposures, both ingestions and chemical burns, with a special interest in cases where the child accessed the torch fuel or lamp oil from the original bottle. Staff found 42 pediatric torch fuel or lamp oil exposure incidents reported to the CPSC from January 2000 through July 2011. Four of the pediatric torch fuel or lamp oil exposure incidents reported to the CPSC involved a death. Additionally, based on estimates from the National Electronic Injury Surveillance System (NEISS), staff estimates that there were 8,500 emergency department-treated pediatric torch fuel and lamp oil exposures during the 11-year period from 2000 through 2010.

Reported Incidents

Staff found 46 reports to the CPSC involving pediatric torch fuel or lamp oil exposures. Analysis for duplicate reports of the same incident found 42 unique incidents among those reports. Table 1 (next page) shows the incident counts by torch fuel or lamp oil source and injury status.

CPSC Hotline: 1-800-638-CPSC(2772) CPSC's Web Site: <http://www.cpsc.gov>

**Table 1: Reported Pediatric Torch Fuel or Lamp Oil Exposure Incidents
by Torch Fuel or Lamp Oil Source and Injury Status, January 2000-July 2011**

Source	No Injury	Injury	Hospitalized	Death	Unknown	Total	Percent
Bottle	1	4	7	0	2	14	33%
Other than Bottle	0	4	15	1	0	20	48%
Unknown	0	1	3	3	1	8	19%
Total	1	9	25	4	3	42	100%

*Source: Injury and Potential Injury Incident, In-Depth Investigation,
and Death Certificate databases, August 2011*

Reporting continues for these databases and reported number of incidents may change in the future.

Cases of the oil or fuel being accessed from the bottle in which the torch fuel or lamp oil was sold were counted as “bottle source incidents.” Incidents counted as “other than bottle source” were cases in which the oil or fuel was accessed from a source other than the original bottle, such as the lamp or torch itself or another container that the oil or fuel was transferred to after purchase. Incidents defined as “unknown source” did not have enough information to determine whether the oil or fuel came from the original bottle. In some cases the source of the oil or fuel was completely unclear, in other cases it was not clear whether the container the child accessed was the original bottle.

The majority of the incidents involved children under the age of 3. Of the 42 incidents, 39 incidents (93%) involved a child under the age of 3 years, and 3 incidents (7%) involved a child 3 or 4 years of age. Table 2 shows the incident counts by torch fuel or lamp oil source and age category.

**Table 2: Reported Pediatric Torch Fuel and Lamp Oil Exposure Incidents
by Torch Fuel or Lamp Oil Source and Injury Status, January 2000–July 2011**

Source	0–2 Years	3–4 Years	Total	Percent
Bottle	14	0	14	33%
Other than Bottle	19	1	20	48%
Unknown	6	2	8	19%
Total	39	3	42	100%

*Source: Injury and Potential Injury Incident, In-Depth Investigation,
and Death Certificate databases, August 2011*

Reporting continues for these databases, and reported number of incidents may change in the future.

Four of the incidents involved the death of the child accessing the torch fuel or lamp oil. In 2002, an 11-month-old girl ingested lamp oil at home from an unknown source and died a few days later. In 2007, a 20-month-old boy drank some lamp oil from an unknown source. He remained unresponsive and in need of a ventilator until his mother removed life support 21 days later. In 2009, a 15-month-old boy poured kerosene over himself. He inhaled and ingested some of the kerosene and died the next day. It was not clear if he ingested the kerosene from a lamp his mother had just filled or from the container from which she filled the lamp. In 2010, a 3-year-old boy drank an unidentified fuel from a landscaping torch and he died from internal injuries caused by the ingestion.

Emergency Department-Treated Injuries

Staff found 253 cases of pediatric torch fuel or lamp oil exposure in the National Electronic Injury Surveillance System (NEISS) from 2000 through 2010. Based on these cases, staff computed a national estimate of 8,500 emergency department-treated injuries, with a coefficient of variance (C.V.) of 13.29 percent. The 95 percent confidence interval for this estimate is 6,300 to 10,700. The yearly estimates for pediatric torch fuel and lamp oil exposures could not be calculated due to low sample sizes. Estimates for incidents based on age categories could not be calculated due to low sample sizes, but the vast majority of incidents involved children less than 3 years of age. Estimates for incidents based on torch fuel or lamp oil source could not be calculated due to low sample sizes. The number of sample cases for each torch fuel or lamp oil source is shown in Table 3.

Table 3: Pediatric Torch Fuel and Lamp Oil Exposure Emergency Department-Treated Injuries by Lamp Oil Source (Sample Case Counts), 2000–2010

Source	Cases	Percentage
Bottle	20	8%
Other than Bottle	67	26%
Unknown	166	66%
Total	253	100%

Source: National Electronic Injury Surveillance System, August 2011

The torch fuel or lamp oil sources for emergency department-treated injuries are the same as those in the anecdotal incidents characterized in the Reported Incidents section above.

Additional Information

The 42 reported incidents in Table 1 include 31 incidents that were investigated by CPSC staff. Of the 31 investigated incidents, 28 were based on emergency department treated injuries, 2 were based on Injury and Potential Injury Incident (IPII) database, and 1 was based on the Death Certificate database. This represents an 11 percent investigation rate for in-scope NEISS cases, a 46 percent investigation rate for in-scope IPII reports, and a 50 percent investigation rate for in-scope death certificates. The overall investigation rates for the relevant databases are 1 percent for NEISS, 9 percent for IPII, and 15 percent for death certificates.⁹

The investigated IPII reports included a hospitalization where lamp oil was accessed from the original bottle and a death where torch fuel was accessed from a torch. The source of the lamp oil ingested could not be determined for the investigated death certificate. Table 4 shows the incident counts by torch fuel or lamp oil source and injury status.

⁹ (O'Brien, 2012)

Table 4: Investigated Pediatric Torch Fuel and Lamp Oil Exposure Incidents by Torch Fuel or Lamp Oil Source and Injury Status, January 2000-July 2011

Source	No Injury	Injury	Hospitalized	Death	Unknown	Total	Percent
Bottle	0	3	6	0	0	9	29%
Other than Bottle	0	3	14	1	0	18	58%
Unknown	0	0	3	1	0	4	13%
Total	0	6	23	2	0	31	100%

Source: In-Depth Investigation database, August 2011

Reporting continues for these databases and reported number of incidents may change in the future.

Investigations based on emergency department treated injuries use a telephone questionnaire developed for pediatric poisonings. The questionnaire includes questions on the circumstances surrounding the incident, the exact substance ingested, the child resistant features of the container, and the treatment of the child. Investigations based on IPII reports and death certificates include the questionnaire, but also include more detail on the product and attempts to contact first responders and other medical personnel. The investigations are done to track data and detect violative products related to the Poison Prevention Packaging Act (PPPA).

The American Association of Poison Control Centers (AAPCC) tracks all calls to poison control centers in the United States. Data on these calls are stored in the National Poison Data System (NPDS). Based on AAPCC's annual reports, the NPDS data for 2006-2010 contains 4 pediatric poisoning fatalities caused by torch fuel or lamp oil. A summary of these deaths is given in Table 5. No further information on these deaths is given in the annual reports, and NPDS data does not contain information on the container from which the substance was obtained.

Table 5: NPDS Pediatric Torch Fuel and Lamp Oil Fatalities, 2006-2010^{10,11 12}

Year	Victim	Route	Reason
2007	20 month old male	Ingestion and aspiration	General unintentional
2009	2 year old male	Ingestion and aspiration	General unintentional
2010	3 year old female	Ingestion and aspiration	General unintentional
2010	3 year old male	Ingestion and aspiration	General unintentional

Methodology

The National Electronic Injury Surveillance System (NEISS) is a probability sample of approximately 100 U.S. hospitals having 24-hour emergency departments (EDs) and more than six beds. Coders in each hospital code consumer product-related data from the ED record, and the data is then transmitted electronically to the CPSC. Because NEISS is a probability sample, each case collected represents a number of cases (the case's *weight*) of the total estimate of

¹⁰ (Bronstein, Spyker, Cantilena, Green, Rumack, & Heard, 2007 Annual Report of the American Association of Poison Control Centers' National Poison Data System (NPDS), 2008)

¹¹ (Bronstein, Spyker, Cantilena, Green, Rumack, & Griffin, 2009 Annual Report of the American Association of Poison Control Centers' National Poison Data System (NPDS), 2010)

¹² (Bronstein, Spyker, Cantilena, Green, Rumack, & Dart, 2010 Annual Report of the American Association of Poison Control Centers' National Poison Data System (NPDS), 2011)

injuries in the United States. Different hospitals carry different weights, based on stratification by their annual number of emergency department visits.¹³

Hazard Analysis staff used SAS ® version 9 to compute estimates and the associated coefficients of variation for the number of unintentional pediatric poisoning injuries. A coefficient of variation (C.V.) is the ratio of the standard error of the estimate (*i.e.*, variability) to the estimate itself. This is generally expressed as a percent. A C.V. of 10 percent means the standard error of the estimate equals 0.1 times the estimate. Staff used SAS PROC MIXED to take into account the complex sample design.

CPSC's Injury and Potential Injury Incident File (IPII) is a database containing reports of injuries or potential injuries made to the Commission. These reports come from news clips, consumer complaints received by mail or through the CPSC's telephone hotline or website, Medical Examiners and Coroners Alert Program (MECAP) reports, letters from lawyers, and similar sources. While the IPII database does not constitute a statistical sample, it can provide CPSC staff with guidance or direction in investigating potential hazards.

CPSC purchases death certificates from all 50 states, New York City, the District of Columbia, and some territories. Only those certificates in certain E-codes (based on the World Health Organization's International Classification of Diseases ICD-10 system) are purchased. These are then examined for product involvement before being entered into the CPSC's death certificate database. The result is neither a statistical sample nor a complete count of product-related deaths, nor does it constitute a national estimate. The database provides only counts for product-related deaths from a subset of E-codes. For this reason, these counts tend to be underestimates of the actual numbers of product-related deaths. Death certificate collection from the states also takes time. As of July 2011, the Death Certificates database was considered 97 percent complete for 2007, 87 percent complete for 2008, 73 percent complete for 2009, and 24 percent complete for 2010.

All of the above databases were searched on August 8, 2011, for incidents with the product codes 964 (Lamp oils) and 4060 (Fuel-burning lighting equipment), and which involved a child under 5 years of age. The cases were examined by CPSC staff to make sure they were ingestions or chemical burns and to determine the source of the torch fuel or lamp oil. Burns and deaths from torch fuel or lamp oil related fires were excluded. Also excluded were all cases involving citronella lamp oil or "essential oils." These are used as pesticides, and are therefore outside the scope of CPSC regulation.

¹³ (Kessler and Schroeder, 1999)

TAB D



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MARYLAND 20814

Memorandum

Date: January 6, 2012

TO : Sharon R. White, Engineering Psychologist, Division of Human Factors

THROUGH: Mary Ann Danello, Ph.D., Associate Executive Director,
Directorate for Health Sciences
Lori E. Saltzman, M.S., Division Director, Directorate for Health Sciences

FROM : Adrienne R. Layton, Ph.D., Pharmacologist, Directorate for Health Sciences

SUBJECT : Torch Fuel and Lamp Oil Hazards

I. Background

On April 26, 2011, Betsy Bumpas petitioned the U.S. Consumer Product Safety Commission (CPSC) to require that torch fuel and lamp oil be packaged in non-see-through containers. The petitioner stated that torch fuel and lamp oil, as currently packaged, resemble juice, which young children enjoy drinking.

Lamp oil and torch fuel contain petroleum distillates, which are a group of hydrocarbon-based chemicals that are refined from crude oil. Petroleum distillates include gasoline, naphtha, mineral spirits, kerosene, paraffin wax, and tar. The viscosity of the petroleum distillate-containing product determines the potential hazard. Viscosity is the measurement of the ability of the liquid to flow. Liquids with high viscosities are thick or "syrup-like," and liquids with low viscosities may be more "watery" or volatile.

The hazard of petroleum distillates is principally respiratory in nature: direct aspiration into the lung, or aspiration during vomiting, of small amounts of these chemicals can result in chemical pneumonia, pulmonary damage, and death. Petroleum distillates with low viscosity, such as gasoline or kerosene, possess a greater potential for aspiration.

A. Requirements Under the Federal Hazardous Substances Act (FHSA)

The CPSC regulates the labeling of hazardous household substances containing 10 percent or more petroleum distillates under the Federal Hazardous Substances Act (FHSA), which requires special cautionary labeling for products containing 10 percent or more by weight of petroleum distillates, such as kerosene, mineral seal oil, naphtha, gasoline, mineral spirits, Stoddard solvent, and related petroleum distillates (16 CFR § 1500.14(a)(3), and (b)(3)(ii)). The product label must contain the signal word "DANGER," the statement(s) of hazard "Harmful or fatal if swallowed," the statement "Call physician immediately," and the balance of labeling

CPSC Hotline: 1-800-638-CPSC(2772) CPSC's Web Site: <http://www.cpsc.gov>

required by Section 2(p)(1) of the FHSA, including the statement “Keep out of reach of children.”

B. Requirements Under the Poison Prevention Packaging Act (PPPA) of 1970

Illuminating preparations, such as torch fuel and fuel for decorative and functional lanterns, which contain 10 percent or more by weight of petroleum distillates and have a viscosity of less than 100 Saybolt universal seconds (SUS) at 100° F, are required to be in special or child-resistant, and senior-friendly packaging, in accordance with standards under the PPPA. (16 CFR § 1700.14 (a)(7)). Products with viscosities below this level have been associated with chemical pneumonia and death. The PPPA addresses the hazard of original packages of lamp oils, including lamps sold or marketed while containing lamp oil, but it does not address labeling or packaging requirements for lamp oils that are transferred from an original package to a lamp.

C. Requirements Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

Some lamp oils or torch fuels contain citronella, which is an insecticide. These products will not be covered in this memo because the U.S. Environmental Protection Agency (EPA) sets child-resistant packaging standards for insecticides under FIFRA^{14,15}.

II. Hazards of Torch Fuel and Lamp Oil

A. General Health Impact¹⁶

The clinical presentation of patients following hydrocarbon ingestion may include gastrointestinal (GI), central nervous system (CNS) or respiratory symptoms. A physical exam conducted within six hours of ingestion of a hydrocarbon may show an initial burning sensation in the mouth and throat, followed by bronchospasm with tachypnea, dyspnea, wheezing or alveolar pathology, including rales, coughing, and cyanosis. This suggests lower airway involvement (Eade, 1974; Shirkey, 1971). Blood gases measured upon arrival to the emergency department reveal a trend toward hypoxia and hypocapnia (Dudin, 1991). Fever, probably caused by pulmonary tissue damage, may develop and persist for up to several days (Truemper, 1987). Symptoms progress during the first 24 hours after aspiration, reach a plateau, and then subside between the second and fifth days. The usual hospitalization from hydrocarbon ingestion may last from three to five days; however, pulmonary edema, hemoptysis, and cyanosis may occur and result in longer hospitalizations. If death occurs, it usually follows within 24 hours after aspiration (Victoria, 1987; Nagi, 1995).

A study of 46 hospitals where patients ingested hydrocarbons showed that 29 percent ingested one ounce (29.6 ml) or more, 35 percent ingested two teaspoons (10 ml) to one ounce (29.6 ml), and 35 percent of patients ingested less than two teaspoons (10 ml). Patients who drank one ounce (29.6 ml) or more, in general, had a larger percentage of both pulmonary and

¹⁴ <http://www.epa.gov/opprd001/crp/>

¹⁵ <http://www.epa.gov/oppsrd1/REDs/factsheets/3105fact.pdf>.

¹⁶ Definitions of medical terms are found in the glossary at the end of this memo.

CNS complications. Forty-nine percent of those patients who vomited developed pulmonary complications, compared with 34 percent of those who did not vomit (Press, 1962).

Ingestion of hydrocarbons can cause GI tract symptoms, such as nausea, vomiting, abdominal pain, and diarrhea due to mucosal irritation (Truemper, 1987; Litovitz, 1988). Spontaneous vomiting may occur in up to one-third of patients, increasing the likelihood of aspiration (Truemper, 1987) and resulting in a higher percentage of complications (Press, 1962).

CNS effects have also been reported following hydrocarbon ingestion (Wolfsdorf, 1976; Litovitz, 1988; Lifshitz, 2003; Press, 1962; Marks, 1972), which can be as mild as light-headedness, dizziness, euphoria, headache, visual disturbances, and impaired memory; but may progress to seizures, coma, respiratory paralysis, and death (Wasserman, 1982; Fagbule, 1992; Shotar, 2005). These symptoms may occur when volatile hydrocarbons displace air in the lungs with vapor and cause hypoxia (Gerarde, 1963). Other factors, such as the direct toxic effects of certain hydrocarbons, may play a role in the pathogenesis of CNS involvement (Lifshitz, 2003). Depression of the CNS may occur from absorption of toxic fractions or impurities contained within kerosene (Foley, 1954). Hypoxia, secondary to kerosene pneumonitis, was the most potent CNS abnormality in primates (Wolfsdorf, 1976).

Although ingestion of hydrocarbons can cause GI and CNS effects, the primary hazard associated with ingestion of lamp oil is aspiration into the lungs, with serious and potentially fatal medical consequences, such as pneumonitis (Banner, 1983; Press, 1962; Salm, 1970; Litovitz, 1988; Thalhammer, 2005; Pham, 2008; CDC 1998; Aziz, 2007). Evidence that hydrocarbon aspiration, rather than ingestion, causes pulmonary damage includes x-rays, the rapid onset of symptoms, surgical animal studies, and the median lethal dose (LD₅₀) ratios. The x-rays of lungs following hydrocarbon ingestion show unevenly distributed perihilar mottling, pneumonic consolidation, alveolar collapse, and pulmonary edema. This suggests that aspiration is the main cause of lung damage following hydrocarbon ingestion. If damage was caused solely by GI absorption and hydrocarbon transport to the lungs through the vascular system, the lesions would be distributed uniformly (Eade, 1974). Second, animals and patients develop a rapid onset of symptoms after being exposed to hydrocarbons. This suggests that aspiration is the principal hazard (Eade, 1974) because it would take time for a hydrocarbon to be absorbed by the GI tract and circulate through the vascular system and pool in the lungs. Third, esophageal ligation in animal studies prevented vomiting and subsequent aspiration. In addition, sublethal installation of hydrocarbons into the stomach caused little or no pulmonary damage (Giammona, 1967; Wolfe, 1970; Eade, 1974; Dice, 1982). Furthermore, the ratio of the LD₅₀ (oral)/LD₅₀ (intratracheal) for kerosene is 140/1. That is why it takes 140 times the amount given orally as the amount given intratracheally to cause death in 50 percent of the animals (Gerarde, 1959). Therefore, the hydrocarbon is not absorbed from the GI system by a great degree. If a substantial amount was absorbed by the GI tract, the LD₅₀ (oral)/LD₅₀ (intratracheal) would be lower than 140/1. It is not recommended to induce vomiting following ingestion, where hydrocarbons pose little threat of systemic effects, such as when kerosene and naphtha have been ingested (Litovitz, 1988; Bratton, 1975).

In rare cases, cardiac muscle disorders (Nierenberg, 1991) and renal effects (Roberge, 2001) have been reported following hydrocarbon ingestion. These usually occur in the context of

severe respiratory failure with hypoxia and acidosis. Acute renal failure occurs occasionally following oral, inhalational, dermal exposures, and following hydrocarbon ingestion, but not after intravenous or subcutaneous administration of straight chain hydrocarbons (Banner, 1983; Landry, 1998).

Oil spilled from a glass candle lamp on skin has caused transient dermatitis (Burda, 1997). This is because hydrocarbons dissolve the lipid-rich membranes of the microvasculature in the affected area, with the pattern of injury being similar to liquefaction necrosis (Rush, 1998).

B. Mechanism of Aspiration

The toxicity of petroleum distillates is primarily respiratory in nature. Direct aspiration into the lung, or aspiration during vomiting, of small amounts of these chemicals can result in chemical pneumonia, pulmonary damage, and death.

Following ingestion, aspiration of liquids from the mouth into the lungs is an acute incident occurring in the time required to take a breath. As soon as liquid enters the lungs, there is a momentary cessation of breathing with coughing, which limits the amount of fluid aspirated. For example, an individual will usually aspirate only once, while an anesthetized individual may aspirate more than once because the normal physiological processes that limit aspiration are inhibited by the anesthesia (Gerarde, 1963).

The risk of aspiration increases with decreased viscosity and decreased surface tension (Gerarde, 1963). Viscosity depends upon a substance's flow as a function of the friction caused by its molecular components. It is the most important physical property that determines the aspiration hazard of liquid hydrocarbons. Low-viscosity substances offer less resistance, flow easily, and penetrate into the lower airways (Victoria, 1987; Gerarde, 1963; Truemper, 1987). Compounds with viscosities less than 35 SUS pose a great aspiration hazard, whereas those with a viscosity of 60 to 100 SUS or greater, carry a lower aspiration potential (Litovitz, 1988). Gerarde, 1963, blended kerosene with lubricant oil and produced kerosene with a viscosity of 58 SUS at 100°F, which caused minimal lung injury, and no mortality in rats.

The current PPPA regulations impose a special packaging requirement on furniture polish, lighter fluid, or paint solvents, with 10 percent or more petroleum distillates and a viscosity of less than 100 SUS at 100°F. This viscosity has been used to define the upper limit of the aspiration hazard because products associated with chemical pneumonia and death had viscosities below this level.¹⁷

Surface tension is a property of liquids that occurs when liquid surfaces behave like thin, elastic films, and the molecules at or near the surface undergo a net attraction to the rest of the fluid. Molecules that are not near the surface are attracted to other molecules equally in all

¹⁷ Memorandum from Suzanne Barone, PhD., Directorate for Epidemiology and Health Sciences, dated August 10, 1999, Subject: Proposed Rule to Require Special Packaging for Hydrocarbons of Low Viscosity.

directions. They do not undergo a net attraction. Low surface tension allows a hydrocarbon to spread rapidly over a surface. Surface tension varies within a narrow range for most hydrocarbon mixtures, making it less important than viscosity in producing an aspiration hazard (Gerarde, 1963).

Volatility, the property of rapid evaporation, allows hydrocarbons to enter the CNS via the bloodstream after either inhalation or ingestion (Gerarde, 1963). Substances with intermediate volatility and low-to-intermediate viscosity, such as kerosene or lamp oils, are involved in most accidental pediatric ingestions (Wasserman, 1982). Substances with high viscosity, such as mineral oil (> 150 SUS), are less likely to cause lung pathology, unless directly aspirated into the lungs (Truemper, 1987; Litovitz, 1988).

Following ingestion with subsequent aspiration, hydrocarbons may pool in the pulmonary lobes and cause irritation, chemical pneumonitis, ventilation/perfusion abnormalities; inflammation, pneumatoceles, and respiratory failure. Chemical irritation occurs as hydrocarbons disrupt membrane integrity and dissolve lipid-rich microvasculature in exposed areas. The pattern of injury following hydrocarbon irritation is similar to liquefaction necrosis (Bratton, 1975; Hansbrough, 1985; Rush, 1998; Roberge, 2001). Initial pulmonary injury may not result from direct parenchymal destruction; but rather, it may result from the interaction of hydrocarbons with surfactants in the alveoli (Giammona, 1967; Eade, 1974). Surfactants reduce surface tension within alveoli, which requires less pressure to hold the alveoli open (Robbins, 1989). Hydrocarbon binding to surfactants can lead to alveolar instability with collapse and early distal airway closure. These abnormalities cause ventilation-perfusion inequalities, resulting in hypoxia, atelectasis, and edema (Eade, 1974; Horoz, 2009; Giammona, 1967).

Ventilation perfusion inequalities result from an uneven distribution of air and blood flow within the lungs. Blood oxygen decreases when the pairing of oxygen and blood in the alveoli does not occur in the correct ratio (Robbins, 1989). This could be caused by pulmonary edema, hemorrhage, abnormalities in surfactant with alveolar instability, and collapse or a combination of these factors (Truemper, 1987). Acute exudative and chronic proliferative inflammation has been described in rats (Gross, 1964) and dogs (Steele, 1972) given intratracheal kerosene.

Pneumatoceles, pulmonary cysts filled with air, develop from the necrotic portions of the lung, approximately 10 days after ingestion of hydrocarbons (Aziz, 2007). They form in the areas of the densest infiltrations only, when patients are absent of clinical symptoms. Their formation does not depend on the amount of aspirated hydrocarbon, and they are usually an unexpected finding on follow-up roentgenograms. Resolution of the pneumatocele usually occurs between 15 days and 21 months and almost never requires surgical intervention (Harris, 1975; Bergeson, 1975).

The pathology of postmortem lungs from children following hydrocarbon aspiration, reveal hyperemia, hemorrhagic pulmonary edema, atelectasis, inflammation, bronchiolar and alveolar tissue necrosis, vascular thromboses, bronchopneumonia with polymorphonuclear exudates and hyaline membrane formation in the alveoli (Bolande, 1967).

III. Conclusion

Ingestion of hydrocarbons, such as lamp oil and torch fuel, can cause GI, CNS, and pulmonary effects. However, serious injuries and death from hydrocarbons are due primarily to severe pulmonary effects from aspiration following ingestion. As a result, the Commission requires child-resistant packaging for illuminating preparations for decorative and functional lanterns, which contain 10 percent or more by weight of petroleum distillates and have a viscosity of less than 100 SUS at 100° F, to protect young children from serious injury, illness, or death (16 CFR § 1700.14(7)). The PPPA addresses the hazard of original packages of lamp oils, including lamps sold or marketed while containing lamp oil. Under the FHSA, special hazard labeling is required for products containing 10 percent or more by weight of petroleum distillates (16 CFR § 1500.14(a)(3), and (b)(3)(ii)). The product label must contain the signal word “DANGER,” the statement(s) of hazard “Harmful or fatal if swallowed,” the statement “Call physician immediately,” and the balance of labeling required by Section 2(p)(1) of the FHSA, including the statement “Keep Out of Reach of Children.”

Glossary of Terms

Acidosis—an abnormal increase in the acidity of the body's fluids.

Alveoli—tiny, delicate air sacs deep within the lungs where the gas/blood exchange occurs.

Aspiration—the drawing of a foreign substance into the respiratory tract during inhalation.

Atelectasis—total or partial collapse of the lung.

Bronchiolar and alveolar tissue necrosis—the death of tissues in the bronchioles (small tubes of the lungs that convey air) and in the alveoli.

Bronchopneumonia—pneumonia characterized by acute inflammation of the walls of the bronchioles.

Chemical pneumonitis—pulmonary inflammation caused by a chemical.

Chronic proliferative inflammation—an increase in tissue cells, particularly reticuloendothelial macrophages.

Cyanosis—a bluish discoloration of the skin and mucous membranes resulting from inadequate oxygenation of the blood.

Dermatitis—inflammation of the skin.

Dyspnea—shortness of breath.

Edema—abnormal collection of fluids in the cells, tissues, and other parts of the body, causing swelling.

Exudative—the oozing of fluid and other materials from cells and tissues, usually resulting from inflammation or injury.

Hemoptysis—the coughing up of blood from the lungs or airways.

Hemorrhagic pulmonary edema—swelling in the lungs with blood.

Hyaline membrane—a glassy translucent membrane.

Hydrocarbons—molecules, containing only carbon and hydrogen. A saturated hydrocarbon that does not contain rings, double, or triple bonds.

Hyperemia—the increase in blood flow to an organ.

Hypocapnia—insufficient blood levels of carbon dioxide.

Hypoxia—insufficient blood levels of oxygen.

Intratracheal injection—an injection into the trachea, the major airway of the respiratory system.

LD₅₀—an individual dose that can kill 50 percent of a population of test animals.

Ligation—the act of binding by tying a ligature.

Liquefaction necrosis—a type of necrosis characterized by a fairly well-circumscribed, lesion, which consists of fluid remains of tissue that became necrotic and was digested by proteolytic enzymes liberated from disintegrating leukocytes.

Parenchyma—tissues that are characteristic of organs, as distinguished from associated connective or supporting tissues.

Perihilar—near an area of the lung where the vessels and nerves enter and exit.

Pneumatoceles—usually benign, thin-walled, air-containing cysts of the lung that may develop as a one-way valve mechanism, caused by partial bronchial obstruction from the surrounding inflamed tissue. On inspiration, tissue surrounding the bronchus dilates and allows air to enter the lungs. Air escape is prevented as the bronchus narrows upon expiration.

Pneumonic consolidation—when lung tissue is filled with inflammatory cell secretions.

Pneumonitis—pulmonary inflammation.

Polymorphonuclear exudates—inflammatory cell secretions.

Pulmonary edema—fluid accumulation in the lungs.

Rales—small clicking, bubbling, or rattling sounds in the lung.

Roentgenogram—a photograph made with x-rays.

Saybolt Universal Seconds (SUS)—the number of seconds it takes for a fixed amount of hydraulic fluid to move through a standard-sized orifice at a fixed temperature. It is a unit of measurement of relative viscosity.

Surfactants—substances composed of lipoproteins secreted by the alveolar cells of the lung that serve to maintain the stability of pulmonary tissue by reducing the surface tension of fluids that coat the lung.

Tachypnea—rapid breathing.

Thromboses—blood clots.

Ventilation perfusion mismatch—results from an uneven distribution of air and blood flow within the lungs. When the pairing of oxygen and blood in the alveoli of the lungs does not occur in the correct ratio, the oxygen in the blood decreases.

Viscosity—depends upon a substance's flow as a function of the friction caused by its molecular components.

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T A B L E



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MARYLAND 20814

Memorandum

Date: January 26, 2012

TO : The File

THROUGH: Robert B. Ochsman, Ph.D., Director,
Division of Human Factors

George A. Borlase, Ph.D., P.E.
Associate Executive Director
Engineering Sciences

FROM : Sharon R. White, Engineering Psychologist
Division of Human Factors
Directorate for Engineering Sciences

SUBJECT : Human Factors Analysis of the Torch Fuel and Lamp Oil Petition

Background

On May 13, 2011, the U.S. Consumer Product Safety Commission (CPSC) received a letter from Betsy Bumpas, petitioning the Commission to initiate rulemaking to require that torch fuel and lamp oil are packaged in non-see-through containers. On July 7, 2011, the CPSC's Office of the General Counsel docketed the request as petition PP-11-1 under the Poison Prevention Packaging Act (PPPA).

Torch fuel and lamp oil are already subject to special packaging (i.e., child resistant and senior-friendly packaging) and labeling requirements under the PPPA and the Federal Hazardous Substances Act (FHSA), respectively. The petitioner is asserting that additional packaging requirements are needed. Specifically, the petitioner asserts that certain petroleum distillates, including torch fuel and lamp oil, as currently packaged, resemble apple juice and other juices. The petitioner states that because young children enjoy the taste of juice and are accustomed to drinking it regularly, packaging petroleum distillates in clear plastic bottles poses a risk of injury to children because they may mistake it for juice. The petitioner suggests packaging the fuel in solid-colored containers, opaque plastic child-resistant containers, or metal containers to make it impossible to see the fuel when packaged.

The petitioner maintains that there are many deaths and injuries due to the accidental ingestion of fuels that resemble juice packaged in clear plastic bottles. She relates that "the New Jersey Poison Information and Education System stated in June of 2008 that 4 people were hospitalized, 1 was critically ill, and 1 killed, due to torch oil being mistaken for apple juice."

CPSC Hotline: 1-800-638-CPSC(2772) CPSC's Web Site: <http://www.cpsc.gov>

The petitioner also states that “from 2002 through 2009 the Annual Report of the American Association of Poison Control Centers’ National Data System has chronicled the exposure of many young children to lamp oils, including torch fuels.” The petitioner further cites an incident involving her son when he was celebrating his second birthday at a park on June 9, 2009. The petitioner states that her son saw a partially empty clear bottle of torch fuel,¹⁸ thought the product was juice, and ingested it. He died within a few hours at a hospital.

As stated earlier, this petition is docketed under the PPPA. The PPPA does not authorize the Commission to prescribe specific packaging designs. (15 U.S.C. § 1472(d)). However, in the case of a household substance for which special packaging is required, the Commission may prohibit the packaging of such substances in packages that the Commission determines are “unnecessarily attractive to children.”(Id). Therefore, to issue a rule requiring that torch fuel and lamp oil not be packaged in see-through containers, the Commission would need to determine that the packaging is unnecessarily attractive to children.

Incident Data

CPSC staff is aware of 253 in-scope torch fuel and lamp oil-related cases in the National Electronic Injury Surveillance System (NEISS) from the years 2000 through 2010 (O’Brien, 2011). Based on these cases, staff estimated 8,500 emergency department-treated injuries due to torch fuel and lamp oil ingestions, but was unable to provide yearly estimates due to low sample sizes. Staff was also unable to provide estimates on the age of the victims due to low sample sizes, however, the majority of the incidents involved children under 3 years of age. Staff was further unable to provide estimates on the source of the lamp oil and torch fuel ingestion for the same reasons. However, based on staff counts involving the 253 incidents, 20 (8%) involved a bottle, 67 (26%) involved a container other than a bottle, and 166 (66%) involved unknown containers.

Staff is also aware of 42 reported incidents in the Injury and Potential Injury Incident (IPII), In-Depth Investigation, and Death Certificate databases, of which four involved a death. Thirty-nine of the 42 (93%) incidents involved children under age 3. Of the 42 incidents, 14 (33%) ingestions involved a bottle; 20 (48%) involved other than a bottle; and 8 (19%) involved an unknown source. The following incidents are grouped by the source of ingestion, with short descriptions of circumstances surrounding the incidents.

¹⁸ The petitioner’s son ingested citronella-based torch fuel. Citronella-based torch fuel and lamp oil are pesticides and are subject to EPA requirements, and are, therefore, not under the CPSC’s jurisdiction. Therefore, the Division of Human Factors’ analysis is limited to packages for non-citronella-based torch fuel and lamp oil.

Bottle

Number of Incidents	Description
2	<ul style="list-style-type: none"> • Child in room playing with bottle of clear oil in mouth (mother in restroom for few minutes) • Child in room with lamp oil bottle in mouth (adult left room for few minutes)
1	<ul style="list-style-type: none"> • Playing outside and opened bottle (babysitter witnessed incident; oil looked like apple juice)
6	<ul style="list-style-type: none"> • Crawled into kitchen and obtained bottle of red oil from under counter (adult not nearby) • Grabbed clear-colored lamp oil from cupboard under kitchen sink • Opened bottom door of china hutch and found bottle of blue decorative lamp oil • Obtained lamp oil bottle from a low cabinet in bedroom; took bottles of lamp oil from closet in room • Took lamp oil from nightstand and rubbed on body (believed victim thought oil was lotion)
1	<ul style="list-style-type: none"> • Picked up bottle of lamp oil (concerned that package similar to 4-oz glass baby bottle)
4	<ul style="list-style-type: none"> • CR-closure not closed properly • Ingested candle oil from CR container • Obtained bottle of lamp oil (cap did not work) • Opened CR bottle of lamp oil
Total = 14	

Not Bottle

Number of Incidents	Description
3	<ul style="list-style-type: none"> • Drank oil from decorative lamp (in one of the cases, adult left child in living room) • Got into china closet and drank from decorative oil lamp
2	<ul style="list-style-type: none"> • Took oil lamp off nightstand • Ingested oil from oil lamp
3	<ul style="list-style-type: none"> • Drank oil from non original container • Drank scented oil from bowl (went alone in living room) • Drank kerosene from Tiki Torch
1	<ul style="list-style-type: none"> • Oil from lamp oil bowl splashed in face
4	<ul style="list-style-type: none"> • Drank oil from tube in decorative candle • Drank red oil from decorative candle (went alone in mother's bedroom) • Drank oil from bottle candle • Ingested oil from candle lamp
1	<ul style="list-style-type: none"> • Child supposed to be napping in crib, but reached for candle and pulled out wick. Oil spilled on child and clothes

1	<ul style="list-style-type: none"> • Pulled out wick and sucked on it
3	<ul style="list-style-type: none"> • Climbed onto table and grabbed decanter of colored oil from shelf • Climbed onto chair and pulled wick from decorative candle (mother in restroom) • Climbed drawer handles onto kitchen counter and drank lamp oil from homemade wine bottle candle
1	<ul style="list-style-type: none"> • Opened bedroom door, grabbed lamp, pulled out wick, and drank oil
1	<ul style="list-style-type: none"> • Grabbed oil lantern off TV and drank
Total = 20	

Unknown

Number of Incidents	Description
8	<ul style="list-style-type: none"> • Ingested lamp oil (one was blue oil)
Total = 8	

Discussion

The injury data shows that the ingestion of torch fuel and lamp oil primarily involves children under 3 years of age. The ages in the incidents are consistent with the results of previous studies of child poisoning ingestions (Azizi, Zulkifli, and Kassim, 1994; Krenzelok, 1995; Beirens et al., 2006; and Franklin and Rogers, 2009). According to the research on child behavior, children under age 3 engage in excessive hand-to-mouth contact (Caplan and Caplan, 1973; Caplan and Caplan, 1977; Shelov and Hannemann, 1993; Krenzelok, 1995; and Huges, 1999). They exhibit more outwardly oriented movements and become increasingly mobile between the ages of 8 through 11 months (Caplan and Caplan, 1973; Caplan and Caplan, 1977; Shelov and Hannemann, 1993). These researchers show that these children can crawl forward and backward; explore objects in many different ways such as through mouthing, grasping, shaking, and squeezing, and are beginning to climb. Children this age are also beginning to empty drawers and cupboards. Between 12 through 18 months, children are increasingly walking without support, although still unsteady on their feet. Their ability to walk allows them more opportunity to explore areas of the home that were once inaccessible to them. Some 14-month-olds may climb from the floor to a chair and from a chair to a table, but have a strong desire to do so at 15 months. At age 18 months, children are avid explorers of drawers, cabinets, and closets. Their curiosity far outweighs their ability to foresee dangers. For example, they are curious about mechanical devices, and their increased mobility and fine motor skills allow them to gain access to products stored in packaging, such as screw top bottles (Cornish, Parsons, and Dobbin, 1996).

Children ingest hazardous amounts of a variety of substances even if the substances are unpalatable, including liquid products, such as drain cleaners, dishwasher soap, and pesticides (Sedney, 2010). Other products that have been involved with child-poisoning ingestions include fingernail polish remover, windshield washer fluid, and automobile antifreeze (Franklin and Rodgers, 2009). Curiosity about the taste and mouth feel of materials like powders and liquid (Cornish, Parsons, and Dobbin, 1996) and a desire to imitate adult behavior, such as adults

drinking, are possible explanations for ingestion. Hunger or thirst may also lead children to ingest these substances (Dudin, 1991; Whitford, 2001; and Shotar, 2005). It is not surprising that most of the ingestions involve children under age 3, given their proclivity toward ingesting unpalatable substances, combined with their developmental changes.

In addition to the behavior of the child, there are a number of other factors that may put children under 3 at risk for poisoning ingestions. Such factors may include storage of the product, an improperly closed CR mechanism, transfer of the product to another non-child resistant container, and other risk factors. However, as stated earlier, to issue a rule prohibiting torch fuel and lamp oil from being packaged in see-through containers, the Commission needs to determine that the packaging is unnecessarily attractive to children. There is no statutory definition for unnecessarily attractive to children. However, given the petitioner's request to require torch fuel and lamp oil not be packaged in see-through containers in favor of non-see-through containers, ESHF staff considers unnecessarily attractive, in this case, to mean that see-through containers are more attractive than non-see-through containers. The PPPA defines the term "package" to mean "the immediate container or wrapping in which any household substance is contained for consumption, use, or storage by individuals in or about the household, and, for purposes of section 4(a)(2) of this Act [15 U.S.C. 1473(a)(2)], also means any outer container or wrapping used in the retail display of any such substance to consumers" (CPSC, 2009). Therefore, ESHF staff's analysis focuses on the immediate container (*i.e.*, clear bottle packaging).

Staff found that only 20 (8%) of the 253 NEISS cases involved a bottle. In these 20 cases, the data lacked sufficient detail to determine if the ingestions involved products in clear bottles. Additionally, 166 (66%) of the NEISS cases do not specify whether ingestions occurred directly from the bottle or other container, so even less information is available about whether the ingestions involved a clear bottle. In 42 (33%) IPII cases, the reported incident data provide some detail surrounding the incidents involving a bottle. However, the details are not sufficient, with the exception of one case, to determine whether the ingestions involved a clear bottle. Additionally, 8 (19%) of the cases do not indicate whether the ingestions involved a bottle or other source.

In the vast majority of the cases, there is insufficient information to indicate whether poisoning ingestions occurred from the original packaging, or from sources other than the original packaging. However, in those cases specifying the source of the ingestion, in only one instance does the data indicate that the container was a clear plastic bottle. In most cases, children accessed the product from a container other than the original packaging. A study that corroborates these findings noted that paraffin oil is rarely ingested from a bottle (Craft, 1984). Additionally, staff's findings are consistent with a previous CPSC study of lamp oil ingestions which concluded that, where reports specified the container of the lamp oil, the majority, 54 of 74 (73%) of the incidents, were due to ingestions of lamp oils from lamps rather than from bottles (Aitken, 1999). A more recent study that corroborates staff's findings indicates that the majority of the victims in 1996 (68%) and in 2005 (64%) drank oil from an oil lamp (Van Gorcum, et al., 2009)

Further, children in the at-risk age group, as alluded to earlier, explore through mouthing, have greater mobility and ability to imitate, are very curious, and lack ability to foresee dangers. These behaviors may also lead young children to ingest products hidden from view in non-see-through packaging. Published research suggests that children are likely to ingest these products even if they are in non-see-through containers. For example, common household products such as bleach, most frequently reported for household poisonings among cleaning products (Franklin and Rogers, 2009 and McKenzie, 2010), is known to be packaged in non-see through containers. Although one report indicated that it had insufficient information to determine the source of the ingestion (Franklin and Rogers, 2009), other researchers indicated that some bleach ingestions involved the original packaging (Ashby and Routley, 1996; Melek et al, 2008). Ashby and Routley's, 1996 and Melek et al's 2008 study are based on an analysis of hospital admission data. The 1996 study is based on an analysis of 5 years of data, 1989 to 1993 at 3 hospitals and 4 years of data, July 1991 to June 1995, at one hospital involving chemical and plant ingestions by children under age 5. The 2008 study is based on an analysis of data collected by a hospital on children under age 5 on corrosive substances.

Given the lack of sufficient information, the staff could obtain additional injury data. Staff would need to analyze the data to compare the percentage of children who accessed the substance from clear containers and were poisoned to the total percentage of containers on the market that are clear. This ingestion percentage from clear containers would then have to be compared to that same calculation for non-see-through containers. If staff determines that the percentage of children who accessed the substance from clear containers and were poisoned is significantly greater than that for non-see-through containers, then a reasonable basis exists to conduct research to investigate whether see-through packaging is unnecessarily attractive to children. A search of the current scholarly literature produced no relevant studies.

Even if staff showed that see-through containers are unnecessarily attractive, a rule that would prohibit packaging of torch fuel and lamp oil in see-through packaging would likely have little impact on torch fuel and lamp oil ingestion incidents. ESHF staff believes that reducing the likelihood of poisoning ingestion of torch fuel and lamp oil would lie in reducing the potential for children to access these substances from containers other than from the original bottle packaging such as a lamp or candle itself.

Conclusion

The Commission was petitioned to initiate rulemaking to require that torch fuel and lamp oil be packaged in non-see-through containers. The petitioner believes that packaging petroleum distillates, including torch fuel and lamp oil, in clear plastic bottles poses a risk of injury to children because children may mistake it for juice. To issue such a rule, the Commission would need to determine that the packaging is unnecessarily attractive to children. However, currently available information is insufficient to conclude that these ingestions involved clear plastic bottles.

Packaging torch fuel and lamp oil in non-see-through packaging may not address most poisoning ingestion incidents. In those cases where we know the source of the ingestion, in only one instance does the data indicate that the container was a clear plastic bottle. In most cases,

though, reports indicate that children accessed the product from containers other than the original bottle such as the lamp, candle, or torch itself. Further, research related to other products suggests that children may ingest the substance from non-see-through containers.

The staff could obtain additional injury for further analysis. If staff could show that see-through containers are unnecessarily attractive, the Commission may initiate a rule that would prohibit packaging of torch fuel and lamp oil in see-through packaging. However, such a rule would likely have limited effectiveness. ESHF staff believes that the Commission should focus its efforts on reducing the likelihood for children to ingest substances from containers other than from the original bottle packaging such as a lamp.

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TAB F



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MARYLAND 20814

Memorandum

Date: February 9, 2012

TO : Sharon R. White
Engineering Psychologist
Human Factors Division
Directorate for Engineering Sciences

THROUGH: James C. Hyatt, P.E.
Director
Division of Mechanical Engineering
Directorate for Laboratory Sciences

Andrew G. Stadnik, P.E.
Associate Executive Director
Directorate for Laboratory Sciences

FROM : Gregory K. Rea
Division of Mechanical Engineering
Directorate for Laboratory Sciences

SUBJECT : Review of Non-citronella Torch Fuel and Lamp Oil Consumer Packaging Requirements

I. BACKGROUND AND OVERVIEW

The U.S. Consumer Product Safety Commission (CPSC) received petition PP 11-1 in May 2011, requesting rulemaking to require that torch fuel and lamp oil be packaged in containers that are not see-through to make them less attractive to children. The Poison Prevention Packaging Act 15 U.S.C. §§ 1471–1477 (PPPA) authorizes the CPSC to issue requirements that certain household substances, including non-citronella torch fuel and lamp oil, are sold in child-resistant and senior-friendly packaging (special packaging). Other than child-resistant closures, the PPPA does not permit the CPSC to limit packaging designs, unless the existing packaging is “unnecessarily attractive¹⁹” to children. Staff reviewed the potentially applicable North

¹⁹ 16 CFR part 1700 “Poison Prevention Packaging,” Section 3(d).

American and European voluntary and mandatory standards to understand how the non-citronella torch fuel and lamp oil packaging requirements have evolved since the PPPA was enacted in 1970. Staff was particularly interested to learn whether requirements beyond special packaging were being placed upon consumer retail package designs for household substances.

II. MANDATORY STANDARDS

Staff identified four mandatory standards in addition to the PPPA regulation for non-citronella torch fuel and lamp oil packaging. These fluids are mentioned directly by name or referred to by a classification of their physical properties, such as flash point and viscosity. Non-citronella torch fuel and lamp oil products have a flash point of approximately 63°C (145°F) and a viscosity of approximately 32 Saybolt Universal seconds (SUS) at 100°F. They are considered “a kindling and/or illuminating preparation²⁰” by the PPPA because they contain more than 10 percent petroleum distillates by weight and their viscosity is less than 100 SUS. The PPPA, therefore, requires that they be sold in special packaging.

A. European Union Council Directive 76/769/EEC, Annex I, Amendment 28 May, 2009

Annex I of the classification, labeling and packaging regulation in the European Union, 1272/2008,²¹ was amended in May 2009²² to update lamp oil and other fuels’ packaging requirements. In addition to new coloring, perfuming and labeling requirements, this amendment required these fuels to be “packaged in black opaque containers not exceeding 1 litre.” Section 5 of the Amendment stated that this was done to make them “less likely to attract or arouse the curiosity of children and to avoid that these products are mistaken for drinks.”

B. US 49 CFR Part 100-199 – Department of Transportation Hazardous Materials Regulations

Under 49 CFR Part 178, the U.S. Department of Transportation sets forth requirements for “the manufacturing and testing specifications for packaging and containers used for the transportation of hazardous materials in commerce.²³” The regulations address the physical integrity of container liners, cylinders, portable tanks, and bulk containers of all descriptions. They do not mention consumer packaging of hazardous materials nor do they discuss torch fuel or lamp oil.

²⁰ U.S. 16 CFR § 1700.14 (a) (7), “Kindling and/or illuminating preparations.”

²¹ REGULATION (EC) No 1272/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006.

²² COMMISSION DECISION of 28 May 2009 amending, for the purpose of adapting to technical progress, Annex I to Council Directive 76/769/EEC as regards restrictions on the marketing and use of lamp oils and grill lighter fluids.

²³ U.S. 49 CFR §178.1, “Purpose and Scope.”

C. Health Canada Hazardous Products Act and the Consumer Chemical and Containers Regulation

Petroleum distillates, which include lamp oil and torch fuel, are toxic chemicals, as defined by the Canadian Consumer Chemical and Containers Regulation (CCCR). This regulation requires toxic substances to be packaged in a CR retail package²⁴ when sold in volumes less than 5 L²⁵ (1.14 gal) and that the CR feature(s) shall not be affected by the package contents. Other than a requirement for warning labels, the CCCR does not place transparency, color, or any other aesthetic requirements on lamp oil or torch fuel package design.

D. EN 14059:2002, Decorative Oil Lamps – Safety Requirements and Test Methods

The scope of EN 14059:2002, “Decorative Oil Lamps – Safety Requirements and Test Methods,” applies only to oil lamps not the packaging for their fuel. Specifically, it covers “oil lamps used for decorative purposes in households, restaurants, in recreational facilities, and in similar areas.”²⁶ The standard does not mention consumer or bulk packaging, or storage containers for lamp oils. However, in Section 4.9 “Child Appeal,” the hazard posed by a lamp design attractive to children is addressed. It states that these lamps “shall not resemble or incorporate” design elements appealing to children under 3 years. It then lists examples of appealing shapes, such as “toys, cartoon characters, animals, [...], food, or food and beverage containers.”²⁷ European Union regulation 1907/2006 references EN 14059 and prohibits the addition of coloring agents or perfumes to decorative lamp oil.²⁸

III. VOLUNTARY STANDARDS

A. ASTM Standards for Kerosene Containers

Kerosene, a paraffin-based hydrocarbon, is one of the petroleum distillates commonly used for torch fuel and lamp oil. ASTM International maintains and publishes several standards relating to containers that are used for storage and dispensing of kerosene. The Children’s Gasoline Burn Prevention Act (2008) makes the standards listed below mandatory as they apply to gasoline, but they are voluntary for kerosene applications.

²⁴ Consumer Chemicals and Containers Regulations, 2001 (SOR/2001-269), Section 40 “CHILD RESISTANT CONTAINERS, Sub-category Toxic.”

²⁵ Consumer Chemicals and Containers Regulations, 2001 (SOR/2001-269), Section 14 “Exception – Large Container.”

²⁶ EN 14059:2002 (E), “Decorative oil lamps – Safety requirements and test methods,” Section 1 “Scope.”

²⁷ EN 14059:2002 (E), “Decorative oil lamps – Safety requirements and test methods”, Section 4.9 “Child Appeal.”

²⁸ REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Section C1-M6-M3.

F 976 – 08: Standard Specification for Portable Kerosene and Diesel Containers for Consumer Use

This standard applies to multiuse kerosene and diesel containers intended to be carried from a fill site to storage and distribution sites and stored for long periods between uses. However, F 976-08 does not apply to “single-trip prepackaged containers,” which are containers sold with kerosene in them. It contains performance requirements for drop strength, internal pressure, and several measures of long-term durability. The standard requires containers for kerosene to be predominantly blue in color. This is done to avoid kerosene getting confused with the much more flammable gasoline, which typically is kept in a red container. (Diesel fuel is generally stored in yellow containers for the same reason.)

F 2234 – 08: Standard Specification for Portable Gasoline and Kerosene Spill-Resistant Fueling Systems for Consumer Use

Again, F 2234-08 does not apply to single-trip prepackaged containers. Only portable kerosene and gasoline containers intended for reuse by the consumer are covered. It gives performance requirements intended to reduce spillage and emissions during use and storage and requires that the containers remain structurally sound over time. It references several sections of F 976, including the requirement that kerosene containers be predominantly blue in color.

F 2517 – 05: Standard Specification for Determination of Child Resistance of Portable Fuel Containers for Consumer Use

This standard also does not apply to single-trip prepackaged containers. The requirements of F2517-05 apply only to gasoline containers intended for reuse by the consumer, not kerosene. Gasoline containers must first meet the performance requirements of other standards, and then the requirements for child-resistance and senior adult use effectiveness (SAUE) must be met. This pairing of CR and SAUE is common. It ensures that while accessibility of the contents by children is diminished, it is not simultaneously inaccessible to older adults. The CR and SAUE test procedures given in F 2517-05 are substantially identical to those in the PPPA (16 CFR § 1700.20).

B. NFPA 30

The National Fire Protection Association (NFPA) 30 “Flammable and Combustible Liquids Code” separates combustible liquids into separate classes by flash point. Non-citronella torch fuels and lamp oils have a flash point of about 63°C (145°F), and therefore, are classified as Class IIIA combustible liquids.²⁹

²⁹ Class IIIA combustible liquids are those with a flash point between 60°C (140°F) and 93°C (200°F) per the National Fire Protection Association 30, “Flammable and Combustible Liquids Code.” 2008 Edition.

Containers for flammable (Class I) and combustible (Class II and IIIA) liquids are mentioned in NFPA 30 Chapters 9, “Storage of Liquids in Containers – General Requirements,” and 10, “Storage of Liquids in Containers – Mercantile Occupancies.” These chapters cover portable tanks, intermediate bulk storage containers, and smaller containers made from metal, glass, and plastics, and range in size from 0.5L (1.06 pint) to 3000L (793 gal). Chapters 9 and 10 specify the recommended safe storage and display methods, quantities of packages in any one area or storage cabinet, ventilation, occupancy limits, construction requirements, and other fire protection-related requirements. The intent is to limit the hazard posed by flammable and combustible liquids should the building catch on fire. For example, Table 10.7.1 in Chapter 10 states that the maximum storage density on a display shelf is 4 gal per square foot in a retail display with a sprinkler system that meets NFPA 13 ordinary hazard (Group 2) requirements. Nowhere does NFPA 30 limit the shape, color, closure, or any other design aspect of the plastic consumer packaging used for non-citronella torch fuels and lamp oils.

IV. CONCLUSION

Under the PPPA, the CPSC has issued a rule requiring that torch fuel and lamp oil be in special packaging (products with citronella are not covered). The PPPA prohibits the Commission from prescribing specific packaging designs. However, the Commission may prohibit packaging that is “unnecessarily attractive to children” for household substances that require special packaging. The color of the package is restricted to black in the European Union (Regulation 1272/2008 Annex I, Amendment May 28, 2009). None of the other existing mandatory or voluntary standards known to staff for this product limit consumer package design, other than requiring child-resistant closures. These other regulations and standards reviewed above are primarily concerned with hazards associated with the transport and storage of these fluids in bulk (49 CFR and NFPA 30), the functionality and long-term durability of reusable kerosene containers (ASTM F 976-08 and F 2234-08), and reducing the accessibility of the fluids by children from a container (CRP requirements of the PPPA, F 2517-05, the CCCR and EN 14059).

TAB G



**UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
BETHESDA, MD 20814**

Memorandum

Date: January 24, 2012

TO : Sharon White, Project Manager
Torch Fuel and Lamp Oil Petition

THROUGH: Gregory Rodgers, Ph.D., Associate Executive Director
Directorate for Economic Analysis

Deborah V. Aiken, Ph.D., Senior Staff Coordinator
Directorate for Economic Analysis

FROM : Samantha Li, Economist
Directorate for Economic Analysis

SUBJECT : Petition on Torch Fuel and Lamp Oil: Market Information and Economic Considerations

Background

The Commission received and docketed a petition (PP 11-1), requesting that it initiate rulemaking to require lamp oil and torch fuel to be packaged in containers that are opaque or metal. The petitioner asserts that certain petroleum distillates, including torch fuel and lamp oil, as currently packaged, resemble fruit juice, which makes it appealing to children and increases the likelihood of ingestion. While torch fuel and lamp oil are already subject to child-resistant packaging and labeling requirements under the Poison Prevention Packaging Act (PPPA) and the Federal Hazardous Substances Act (FHSA), the petitioner asserts that additional packaging restrictions are necessary.

This memorandum provides information on the market for torch fuel and lamp oil. The discussion is based on information that was readily available, including information provided by the petitioner.

The Products

Torches and Oil Lamps

Torches are designed for patio and outdoor use. Size varies, depending on the type of torch. A “traditional” torch is composed of bamboo or wood. The bottom of the pole is pointed and must be inserted into the ground in order for the torch to stand upright. The top of the pole extends into slats, which may be separate or interwoven. A plastic or metal container fits into a space

CPSC Hotline: 1-800-638-CPSC(2772) CPSC's Web Site: <http://www.cpsc.gov>

created by the slats. A wick is inserted into the opening in the metal lid; the bottom of the wick is immersed in torch fuel in the container. The flame height is determined by wick exposure; fiberglass or cotton is used in wicks. Torches can be affixed to a wall (wall mount torch) or used without a pole (tabletop torch). Torches may also include a snuffer to extinguish the flame. Torches can be composed of metal, such as copper, brass, or steel, or ceramic.

Oil lamps may be crafted from ceramic, metal, or glass, and typically, they consist of a base or stem, a front (*i.e.*, a reservoir for oil), a wick, and a burner to hold the wick. There are several types of oil lamps, candles, and lanterns. Traditional oil lamps have a chimney made of glass to protect the flame, and are intended for indoor use. Oil candles are also intended for indoor use, but have an exposed flame. Oil lanterns, such as hurricane lanterns, have a glass globe to protect the flame and are suited for outdoor use. Catalytic aroma lamps can be used either indoors or outdoors.

Torch Fuel and Lamp Oil

Petroleum distillates, such as paraffin and kerosene, are refined from crude oil to produce fuel. Liquid paraffin is commonly used as lamp oil. Kerosene may be used as fuel for oil lanterns.

Lamp oil is used in both commercial and domestic purposes. Restaurants use oil lamps and candles for illumination on tables; this type of lamp oil produces little odor or smoke. Kerosene, used as fuel for patio torch lamps, produces smoke. Catalytic aroma lamp oil is generally fragrant and produces smoke. Oil candles may be used for religious ceremonies.

Citronella, an insect repellent, is commonly added to torch fuel. Products containing citronella are not regulated by the CPSC. The U.S. Environmental Protection Agency regulates citronella as an insecticide, including lamp oil and torch fuel, which contain citronella.

Market for Torch Fuel and Lamp Oil

Torch Fuel

One domestic firm manufactures citronella torch fuel. This firm dominates the market and produces multiple brands and products, including paraffin lamp oil. The North American Industry Classification System (NAICS) lists product codes for U.S. firms. Firms that supply kerosene or paraffin may list their business under the NAICS product code for petroleum refineries (*324110 Petroleum Refineries*). However, this firm lists its business under multiple NAICS product codes other than petroleum manufacturing, such as *42399019 All Other Durable Goods Merchant Wholesale*.

At least two foreign firms manufacture citronella used for outdoor torches and lamps. However, it is unknown whether these products are imported into the United States.

One firm specializes in distributing torch fuel for the retail market. Prices range from \$7.50 to \$920, depending upon the size and quantity. Sizes range from 30 ounces to a 55-gallon drum,

and products can be purchased in multiple quantities. This retailer also distributes torch fuel containing eucalyptus and citronella and lamp oil.

Lamp Oil

At least 10 firms supply lamp oil; of these, two firms manufacture paraffin oil, and four firms manufacture kerosene. One firm dominates the market.³⁰ All 10 firms are domestic.

Publicly available information is insufficient to identify the size and dollar sales of most firms. As oil lamps and oil candles have glass components, firms may list their business under the NAICS product code *32721 Glass and Glass Product Manufacturing*. However, firms that manufacture lamps and candles may not manufacture lamp oil.

Some firms list their businesses in product codes other than glass products. Firms may list their business as other manufacturing (*32599805 Other Miscellaneous Chemical Product Manufacturing*, *32419106 Petroleum Lubricating Oil & Grease Manufacturing*, or *32513103 Inorganic Dye & Pigment Manufacturing*); home furnishing (*42322027 Home Furnishing Merchant Wholesale*); or a product code unrelated to glass manufacturing (*33992012 Sporting & Athletic Goods Manufacturing* or *45322013 Gift Novelty & Souvenir Stores*).

Firms that specialize in retail candles and lamps, including oil used in candles and oil lamps, may offer discounts on quantity and shipping. Paraffin oil is sold in several sizes. Retail prices depend upon the brand and package size. Prices for pint sizes range from \$5.37 to \$7.50. Prices of quart sizes range from \$10.80 to \$11.00. The largest size, 2.5 gallons, is \$110.

Retail prices for kerosene vary, depending on the size. Prices for quart size range from \$4.99 to \$23.17. Prices for gallon size range from \$9.79 to \$10.99. Firms may offer online discounts for shipping and quantity.

Torch Fuel and Lamp Oil Packaging

Resources were not available to conduct a formal market survey. However, staff conducted an informal market survey using information from the internet and firm websites. Most products are sold in clear packaging.

Under the PPPA, the Commission requires special packaging (child-resistant or CR packaging) for certain household substances. Specifically, CR packaging requirements apply to “kindling and/or illuminating preparations,” which includes “cigarette lighter fuel, charcoal lighter fuel, camping equipment fuel, torch fuel, and fuel for decorative and functional lanterns which contain 10 percent or more by weight of petroleum distillates and have a viscosity of less than 100 Saybolt universal seconds (SUS) at 100 degrees Fahrenheit.” 16 CFR § 1700.14(a)(7). Under the PPPA, fuel, such as paraffin oil and kerosene, which contains 10 percent or more by weight and a viscosity less than 100 SUS at 100 degrees Fahrenheit are required to have CR packaging.

³⁰ This dominant firm also manufactures citronella torch fuel.

In addition, the Federal Hazardous Substances Act requires special labeling for products containing 10 percent or more by weight of petroleum distillates. 16 CFR § 1500.14(a)(3). The cautionary statements include words such as “Warning” and “Never.”

Gasoline and kerosene containers do not contain a hazardous substance at the time of sale. However, the voluntary ASTM standards (or ASTM, formerly known as the American Society for Testing and Materials) address the potential hazard that could exist from these empty containers once they are filled. Gasoline and kerosene containers intended for consumer use are covered by several ASTM standards, depending on whether the container is for single use or reuse by the consumer. Kerosene containers designed for reuse are required to be blue under ASTM F 976- 02, *Standard Specification for Portable Kerosene and Diesel Containers for Consumer Use*.

At least three manufacturers supply kerosene in a metal container or blue plastic container.

At least two firms supply paraffin oil in clear containers, including the firm that dominates the market. A third firm supplies paraffin lamp oil in a white container; however, publicly available information is insufficient to determine whether the firm manufactures lamp oil.

References

Aitken, Susan C., Division of Health Sciences, February 26, 1999, Subject: Accidental Ingestions of Lamp Oil.

ASTM F 976 — 02 Standard Specification for Portable Kerosene and Diesel Containers for Consumer Use.

ASTM F 2517 — 05 Standard Specification for Determination of Child Resistance of Portable Fuel Containers for Consumer Use.

ASTM F 2234 — 03 Portable Gasoline and Kerosene Spill Resistant Fueling Systems for Consumer Use.

Donaldson, Mary F., Directorate of Economic Analysis, August 24, 1998. Subject: Lamp Oil Market.

Donaldson, Mary F., Directorate of Economic Analysis, February 25, 1999, Subject: Oil Lamp Market.

Tab H

Public Submissions
Petition Requesting Non-See-Through
Packaging for Torch Fuel and Lamp Oil
CPSC Docket No. CPSC-2011-0048
Comments due: November 16, 2011

PUBLIC SUBMISSION

As of: November 21, 2011 Received: July 28, 2011 Status: Posted Posted: July 29, 2011 Category: Consumer/Individual Tracking No. 80ecf139 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0002

Comment from David Schwebel

Submitter Information

Name: David Schwebel

Address:

1348 58th St S
 Birmingham, AL, 35222

General Comment

I write in support of this petition. I am a child psychologist based in Birmingham, Alabama. I have conducted extensive research on preventing unintentional injuries, including poisoning, to children. I have published about 100 peer-reviewed scientific articles and am recognized internationally as an expert in psychological aspects of child safety and injury prevention. One line of my research has examined kerosene poisoning among children in South Africa, where children frequently ingest kerosene stored in transparent bottles and suffer serious injuries or death. Although injury rates in the United States are somewhat lower than in developing nations like South Africa where kerosene is used widely in homes without electricity, there is evidence that many American children and adults suffer injuries and death after ingesting dangerous torch fuels and lamp oils. Any initiative to reduce those injuries is clearly of public health benefit.

To state the obvious, young children who cannot yet read rely heavily on product labeling and appearance to determine its safety for consumption. If a product looks like juice, and smells pleasant, a young child will drink it. We know that child resistant caps reduce the likelihood that a child will open a bottle but are not foolproof. Placing dangerous torch fuels and lamp oils into opaque containers will substantially reduce the likelihood that a child may see the liquid, believe it to be juice or some other appealing beverage, and consume it. We can save lives with this change, and we should act.

As of: November 21, 2011 Received: July 29, 2011 Status: Posted Posted: August 01, 2011 Category: Consumer/Individual Tracking No. 80ecfc41 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0003

Comment from Molly Steele

Submitter Information

Name: Molly Steele

General Comment

The regulation proposed by the CPSC to implement non-see-through packaging on torch fuel and lamp oil has the potential to save many, many lives. According to the CDC, nearly 82 people die every day from accidental or unintentional poisonings and another 2,000 are treated by hospitals. Regulating the packaging of these types of products is needed in order to prevent illness and death associated with drinking this oil/fuel, especially since the color of these products resembles apple juice.

There were 6 cases of accidental poisoning by lamp oil in New Jersey in 2008. One elderly woman died and one 8-year-old girl was hospitalized and placed on a ventilator. This girl survived but will live the rest of her life with damaged lungs. Of the other 4 cases, two others were harmed because of ingestion of the lamp oil and the last two people absorbed it through the skin.

While there are labels on the lamp oil bottles warning about accidental ingestion and contact with skin, the most susceptible potential victims are children who cannot read. This product is so similar in color to apple juice that children automatically assume it will be ok to drink. This proposed regulation should to be enacted, as soon as possible in order to avoid more cases of accidental deaths and illnesses. Enclosing this liquid in bottles that are solid will prevent the color of the fluid from being seen by people, more specifically children, who could potentially be killed by mistaking this liquid for apple juice.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: July 30, 2011 Status: Posted Posted: August 01, 2011 Category: Consumer/Individual Tracking No. 80ed0067 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0004

Comment from David Vearrier, MD

Submitter Information

Name: David Vearrier, MD

Address:

245 N 15th St
 New College Building Suite 2108, Mail Stop 1011
 Philadelphia, PA, 19102

Email: dvearrie@drexelmed.edu

General Comment

As a board-certified medical toxicologist, I support the proposed rule. While the use of child-resistant packaging is important in preventing childhood poisoning, it is not uniformly effective. Child-resistant packaging fails when a child is able to defeat the packaging mechanism or when adults fail to close the container properly and re-engage the protective mechanism after use. The American Association of Poison Control Centers National Poison Data System (NPDS) 27th Annual Report (2009) reported 1,601 lamp oil exposures in children aged 5 years or younger, which included 1 death. Children with lamp oil aspiration events suffer significant morbidity that may require extended pediatric intensive care unit stays and invasive life-saving maneuvers including endotracheal intubation with positive pressure ventilation and extracorporeal membrane oxygenation (ECMO). Additionally, children who survive the acute poisoning may be at a long-term risk for more frequent lower respiratory tract infections, delayed pneumatocele formation, and, less commonly, pulmonary fibrosis or bronchiectasis. To young children, lamp oil resembles juice or other non-juice sweet flavored drinks, giving them incentive to attempt to defeat the child-resistant packaging. The use of non-see through packaging would remove this incentive and, in conjunction with the already mandated child-resistant packaging, reduce the likelihood a child will open the container and suffer a subsequent aspiration event. While I am not knowledgeable about the costs of the production of plastic containers, it does not seem that the proposed rule would impose an undue hardship on manufacturers.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 03, 2011
Status: Posted
Posted: August 03, 2011
Category: Other
Tracking No. 80ed4cae
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0005

Comment from Aaron Davis, MA

Submitter Information

Name: Aaron Davis, MA

Organization: University of Alabama at Birmingham

General Comment

As an injury prevention professional, I believe that non see-through packaging for torch fuel and lamp oil will prevent unnecessary injuries and deaths. Children may easily confuse these products for juice and drink them, causing serious injury. I believe this would be a beneficial step to take in preventing future accidents.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: August 03, 2011 Status: Posted Posted: August 08, 2011 Category: Other Tracking No. 80ed60d9 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0006

Comment from Steven Marcus

Submitter Information

Name: Steven Marcus

Address:

140 Bergen Street, Suite G1600

PO Box 1709

Newark, NJ, 07045-1709

Email: smarcus@njpies.org

Phone: 973-972-9280

Fax: 973-643-2679

Organization: New Jersey Poison Information and Education System at UMDNJ

Government Agency Type: State

General Comment

i am the medical director of the regional poison center for the state of NJ. i am also a pediatrician and medical toxicologist. perhaps more important, I am also the grandfather of 6 wonderful, vulnerable grandchildren.

from my experiences in my above roles, I have a perspective on the safety of children and believe that your potential rule to require the packaging of lamp oil products (also called tiki oil, parrifin oil, kerosene, petrolleum distillate, etc) in opaque containers is an important first step in making these products safer.

Currently, i see the product as te "perfect stor," the substance looks like a fruit juice, is package

in an identical container as fruit juice, and the substance seems to prevent a child-resistant cap from functioning in such a way as to avoid a child from opening it. Further, the larger container sold with this substance is intended to refill backyard torches and it is near impossible to pour the substance into the much smaller opening of the torches, thus forcing individuals to transfer substance into some convenient container which can be squeezed to form a spout to refill the torch. More often than not, the intermediary container is a plastic drinking cup, putting the finishing touches on the perfect storm.

I have seen serious illness and death result from the unintentional ingestion of these products and applaud your efforts, albeit insufficient as I see it, to help protect the innocent children and adults who happen to come across this product.

Attachments

4th of July Torch Lamp Oil Mistaken for Apple Juice May Be Fatal (June09)



1-800-222-1222

Designated regional poison center for New Jersey by New Jersey Department of Health and Senior Services and the American Association of Poison Control Centers

The New Jersey Poison Information & Education System

Serving New Jersey Since 1983

IMMEDIATE RELEASE

Please distribute to the public; your local radio, magazines and newspapers; websites; etc.

Date: June 2009
Contact: Alicia Gambino, MA, CHES
973-972-9280

Caution this 4th of July: Torch Lamp Oil Mistaken for Apple Juice May Be Fatal

(Newark, NJ)- Last year right before the 4th of July holiday, six New Jersey residents became ill after ingesting a small amount of torch oil which was mistaken for apple juice. So far this year there have been seventeen (17) cases of lamp oil ingestion. In at least one of the recent cases, the lamp oil was mistaken for juice. I can not find this data, where is it from? I know Illinois had a publication on their outbreak, we should find it and touch on it.

Last year, one individual, an elderly woman, died two days after mistaking the lamp oil for apple juice. Also, an eight year old girl was hospitalized in critical condition and was placed on a ventilator after mistaking the torch oil for apple juice. This child survived her illness.

According to Bruce Ruck, PharmD. of NJPIES, "Lamp oil refill bottles closely resemble juice containers. They are labeled not to drink, but the warning may not be read before it is too late. Further, it is difficult to pour the liquid directly from the bottle into the torch so frequently the user pours the liquid into a plastic or paper cup in order to then transfer it into the torch. This often leaves a cup with what appears to be lemonade or apple juice sitting in it, a dangerous invitation to disaster! When accidentally taken by mouth, such lamp oils can enter the lungs causing pneumonia and death."

"Jugs containing lamp oils must be stored in a locked cabinet away from the storage of food and drinks. **DO NOT use drinking cups to transfer torch lamp oil from the storage bottle to the torch.** This will help prevent some unintentional poisonings."

There are other poisonous products which look like and come in containers closely resembling juices. It is important for families to pick up all such potentially dangerous products, keep them far from food and educate the entire family on the dangers of these "look-a-likes." The NJPIES website contains a poster representation of other dangerous look-a-likes, it is found at www.njpies.org.

If you suspect a poisoning, call the Poison Control Center for immediate treatment advice as well as for prevention information. Call **1-800-222-1222**, trained medical professionals will provide you with the most up to date emergency treatment advice and will answer any drug or poison information question you may have.

Remember, Help Is Just A Phone Call Away!

located at University of Medicine & Dentistry of New Jersey

140 Bergen Street, Suite G1600, Newark, NJ 07101-1709

Telephone: 973-972-9280

Fax: 973-643-2679

THIS DOCUMENT HAS NOT BEEN REVIEWED OR ACCEPTED BY THE COMMISSION.

Website: WWW.NJPIES.ORG

CLEARED FOR PUBLIC RELEASE UNDER CPSA 6(b)(1)

Poison Emergency? Call 1-800-222-1222
Questions about Poisons? Call 1-800-222-1222
Questions about Poison Prevention? Call 1-800-222-1222
Hearing Impaired May Call 1-973-926-8008

For Press follow-up, please call 1-800-222-1222



EXP

CT 1/20/08

As of: November 21, 2011 Received: August 23, 2011 Status: Posted Posted: August 24, 2011 Category: Consumer/Individual Tracking No. 80eea9e5 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0007

Comment from Lisa Grider

Submitter Information

Name: Lisa Grider

Address:

OK, 73160

General Comment

As an individual that is aware of the tragedy that a transparent, enticing, and odor enriched bottle; I ask that the CPSC change the way any transparent bottle be manufactured. As a mother, again aware of the dangers, has noticed on more then one occasion referenced a "tiki-torch" bottle as apple juice in a grocery store. Please don't make another family suffer due to careless manufacturing.

As of: November 21, 2011 Received: August 23, 2011 Status: Posted Posted: August 24, 2011 Category: Consumer/Individual Tracking No. 80eea9fa Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0008

Comment from Sara Corbin

Submitter Information

Name: Sara Corbin

Address:

3145 NW 21st Street
Newcastle, OK, 73065

Email: scorbin@carrokc.com

Phone: 405-234-2114

Fax: 405-234-2128

General Comment

Why do the bottles have to be clear? Couldn't the torch fuel be just as effective (or more so) in a black or opaque container? In my opinion, there should be a LARGE warning on the front, including a skull & corssbones perhaps, to warn everyone of the fuel's danger. It's awful to think of one of my own children picking up a bottle such as these, hoping to quench their thirst, and instead chugging this deadly fluid. Maybe the lids to these containers should be more jar-like, we woman can't ever get those pesky jar lids open; they even make grippers & gadgets to make it easier for us, and at times even those don't work. I'm sure a toddler would have a hard time with a lid like that as well!! (Just my 2-cents!)

As of: November 21, 2011 Received: August 23, 2011 Status: Posted Posted: August 24, 2011 Tracking No. 80eeaa22 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0009
Comment from Susan Carns

Submitter Information

Name: Susan Carns
Address:
P.O. Box 1991
Oklahoma City, OK, 73101
Email: susancarns@gmail.com
Phone: 405-824-8246

General Comment

Please change the packaging so that it is either not see-through, or so that it can no longer be manufactured to resemble the color of apple juice.

As of: November 21, 2011 Received: August 23, 2011 Status: Posted Posted: August 24, 2011 Tracking No. 80eeaace Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0010
Comment from Brian Grider

Submitter Information

Name: Brian Grider

General Comment

Please change the packaging for the Torch Fuel to look less like a juice for children. As a father of an infant, it is very scary to think of something so simple getting confused and costing the life of a child. Thank you for your time

As of: November 21, 2011
Received: August 23, 2011
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Posted: August 24, 2011
Tracking No. 80eeab0c
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0011

Comment from Amber Prather

Submitter Information

Name: Amber Prather

Address:

16005 Rim Road
Edmond, OK, 73013

General Comment

Request that torch fuel and lamp oil be packaged in opaque or non clear packaging to prevent it being mistaken for fruit juice.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 24, 2011
Tracking No. 80eeb45c
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0012

Comment from Nick Sprowls

Submitter Information

Name: Nick Sprowls

Address:

2700 Rodeo DR

Greenville, Tx, TX, 75402

Email: nicksprows@gmail.com

Phone: 9032681935

General Comment

This is so easy fix to SAVE LIVES. Please listen and take action. Thank you. Nick Sprowls

As of: November 21, 2011 Received: August 24, 2011 Status: Posted Posted: August 24, 2011 Tracking No. 80eeb4da Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0013
Comment from Julia Sprowls

Submitter Information

Name: Julia Sprowls

General Comment

PLEASE change your packaging to save lives. This was truly tragic!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 24, 2011
Category: Consumer/Individual
Tracking No. 80eebfc0
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0014

Comment from Andrew Kubik

Submitter Information

Name: Andrew Kubik

Address:

10921 Derrydown Way

San Diego, CA, 92130

Email: andrewkubik@gmail.com

General Comment

It has come to my attention that torch fuel is packaged in bottles in such a way that it resembles apple juice or other juices. This poses the obvious risk of confusion by a child and can be accidentally ingested and kill the child.

I urge the CPSC to make a rule change that would require manufactures of torch fuel to package the fuel in an opaque container and to include a standard safety cap such at that found on medicines, bleach and other household chemicals.

The cost of compliance would be little, and the additional safety would be significant.

As of: November 21, 2011 Received: August 24, 2011 Status: Posted Posted: August 24, 2011 Tracking No. 80eebfbc Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0015
Comment from Christopher Stucky

Submitter Information

Name: Christopher Stucky

General Comment

Allowing a manufacturer to make poison look like Apple Juice is outrageous. Please put an end to this practice.

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 24, 2011
Category: Consumer/Individual
Tracking No. 80eec049
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0016
Comment from Jan McDiffett

Submitter Information

Name: Jan McDiffett

Address:

15644 SE Holly Court
Milwaukie, OR, 97267-4157

Email: mcdiffj@msn.com

Phone: 5037025841

General Comment

Please use common sense and dilligence to make the pacakaes safer. You alone have the power to make these changes, please use your power wisely. Keep the children of America safe!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 24, 2011
Tracking No. 80eec0a1
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0017

Comment from Timothy Zerillo

Submitter Information

Name: Timothy Zerillo

Organization: Zerillo Law, LLC

General Comment

Please require non-see-through packaging for Torch Fuel and Lamp Oil as a preventative measure to accidental ingestion by children.

Sincerely,

Timothy E. Zerillo
Zerillo Law, LLC
103 Exchange Street
P.O. Box 17721
Portland, ME 04112

As of: November 21, 2011 Received: August 24, 2011 Status: Posted Posted: August 24, 2011 Tracking No. 80eec25d Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0018

Comment from Joseph Vaccaro

Submitter Information

Name: Joseph Vaccaro

Address:

364 Westwood Circle W

W. Palm Beach, FL, 33411

Email: jlvaccaroconsulting@cox.net

Phone: 5613374171

General Comment

Having see thru containers containg dangerous petroleum distillates is a bad idea, especially when the bottle looks like a bottle of applejuice or Juicy Juice container. It is a prelude to a disaster if some child or even an adult with diminished capacity, gets their hands on such a bottle thinking it's a bottle of juice.

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 24, 2011
Tracking No. 80eec321
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0019

Comment from Penny Ostin

Submitter Information

Name: Penny Ostin

Address:

CA,

General Comment

Such a simple fix that could easily save a life; fuel should undoubtedly be package in non-see-through bottles. The fact that this issue is even up for debate, sends chills down my spine. What type of corporation would not want to make this fix immediately?

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 24, 2011
Tracking No. 80eec324
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0020

Comment from Eva Reynolds

Submitter Information

Name: Eva Reynolds

General Comment

I was astonished when I saw the comparison pictures of the torch fuel and the juice. I had trouble telling which was which so I can easily see how a young child could mistakenly drink the fuel thinking it was juice. Please Please make these containers non-transparent . The cost to the manufacturer is so small compared to the cost of even one childs life or health .

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 24, 2011
Tracking No. 80eec43f
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0021

Comment from Patricia Newsome

Submitter Information

Name: Patricia Newsome

General Comment

Please for the safety of our children change the packaging.

As of: November 21, 2011 Received: August 24, 2011 Status: Posted Posted: August 24, 2011 Category: Consumer/Individual Tracking No. 80eec44a Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0022

Comment from Jennifer Overland

Submitter Information

Name: Jennifer Overland

Address:

101 Suffolk Ct

Garden City, KS, 67846

Email: jenniferoverland@gmail.com

Phone: 620-275-8767

General Comment

How would a child under the age of 5 know the difference between apple juice or tiki touch fuel? They can't. They look at color and colorful labels. As a mother of a 5 year old and 1 year old I want to protect them. We need to have the containers changed to nontransparent containers so that they can't a young child can't mistake it for apple juice. Please make this a requirement for companies that sell tiki torch fuel!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 27, 2011
Tracking No. 80eeca58
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0023

Comment from Louise Smith

Submitter Information

Name: Louise Smith

Address:

p.o. box 2138

Duncan, OK, 73534-2138

Email: smithpoms@yahoo.com

Phone: 580-658-1040

General Comment

I'am all for the packaging to charge to a non see through container

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 27, 2011
Tracking No. 80eecebe4
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0024

Comment from Linda Craig

Submitter Information

Name: Linda Craig

Address:

313 n 2nd

Duncan, Oklahoma, 73533

Email: grannycraig3@sbcglobal.net

Phone: 580-255-2727

General Comment

I want to add my name to this petition.

As of: November 21, 2011
Received: August 24, 2011
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Posted: August 27, 2011
Tracking No. 80eecdde
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0025

Comment from Sheila Juhl

Submitter Information

Name: Sheila Juhl

General Comment

Please change the packaging.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: August 24, 2011 Status: Posted Posted: August 27, 2011 Tracking No. 80eece61 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0026

Comment from Michael Carr

Submitter Information

Name: Michael Carr

Address:

1503 east 20th street
Tulsa, 74120

Email: michaelcarr123@gmail.com

Phone: 918-630-0203

Submitter's Representative: none

Organization: none

General Comment

Please have it so where tiki torch fuels are not see through. So many kids needlessly die every year because they mistake torch fuel as apple juice. This could easily be changed if the containers using these fuels were not see through. You have the power to change it and I hope you do.

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 27, 2011
Tracking No. 80eecf06
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0027

Comment from Tony Laizure

Submitter Information

Name: Tony Laizure

Address:

1543 Swan Dr.

Tulsa, OK, 74120

Email: tlaizure@cox.net

Phone: 918-592-3138

General Comment

I have seen and reviewed the Petition submitted by the Bumpus family. What a terrible tragedy that likely could have been prevented if the package was not see through. Allowing the product to be packaged so that it looks like juice is simply an invitation to kill more innocent children.

At what point do we put people over profits?

As of: November 21, 2011
Received: August 24, 2011
Status: Posted
Posted: August 27, 2011
Category: Consumer/Individual
Tracking No. 80eecf47
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0028

Comment from jack koller

Submitter Information

Name: jack koller

Address:

6748 s. Atlanta Pl.

tulsa, OK,

Phone: 918 605 1075

General Comment

i can't understand how anyone would think putting poison in anything that looks drinkable a good idea in anyway i dont care the cost. that is idiotic when a child or even an adult could drink that it is murder because this company didn't think this container through.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: August 24, 2011 Status: Posted Posted: August 27, 2011 Tracking No. 80eecd5 Comments Due: November 16, 2011 Submission Type: Web
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0029

Comment from Leslie Shelley

Submitter Information

Name: Leslie Shelley

Address:

2632 NW 55th Ter
Oklahoma City, OK, 73112

Email: shelleyl@aib.edu

Phone: 918-574-1961

General Comment

Something as dangerous as fuel should not be kept in see-through, plastic container. Although parents strive to keep their children safe from chemicals and fuels that may be harmful to ingest, accidents will happen when manufacturers fail to take precautions. When you take a product such as torch fuel and think about the scenarios where it will be used, children are present the majority of the time. If a manufacturer produces a harmful chemical and then puts it in a clear, plastic bottle, it's foolish to ignore the possibilities of what could happen. Lighter fluid for grills, bleach, windshield washer fluid, 409, and other chemicals are all put into non-see-through packaging because they are harmful. So is tiki torch fuel. Yet it's packaged in bottles that are clear and then colored to look exactly like apple juice. As a consumer, I have a right to know that the product I purchase is safe for use. As a consumer, I trust that the manufacturer has taken steps to prevent me from being harmed. As a consumer, I expect the manufacturer to accept responsibility for what they are producing.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: August 25, 2011 Status: Posted Posted: August 27, 2011 Tracking No. 80eed4dd Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0030

Comment from Desiree Green

Submitter Information

Name: Desiree Green

Address:

RR 2 Box 318
Duncan, OK, 73533

Email: jhonethyngrammy@localnet.com

Phone: 5802526004

General Comment

Please, Please, I am Jhonethyns Grammy !! My life will never be the same, Please don't let another family know the pain, we will forever know! Apple juice is a favorite of most kids, Why allow something so deadly!!! Look anything like it!! PLEASE SAVE THE LIVES OF CHILDREN! DESI GREEN, FOREVER< JHONETHYN'S GRAMMY

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Category: Consumer/Individual
Tracking No. 80eed4b7
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0031

Comment from Robert G

Submitter Information

Name: Robert G

Address:

1217 Charleston Ct

Norman, oklahoma, 73071

Email: rgamestop@yahoo.com

Phone: 4054120309

General Comment

Any substance that is dangerous to human or animal life should be sold in a container that is opaque and have a child resistant opening. The company can still have what ever logo or marketing labels it chooses but the contents should not be seen to prevent children and special needs adults from ingesting them.

As of: November 21, 2011 Received: August 25, 2011 Status: Posted Posted: August 27, 2011 Category: Consumer/Individual Tracking No. 80eed51d Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0032

Comment from Patricia Helton

Submitter Information

Name: Patricia Helton

Address:

2114 S 121st E Avenue

Tulsa, OK, 74129

Email: auburnred39@hotmail.com

Phone: 559-474-7759

General Comment

Please change the packaging so no more children die! This must be done !!

As of: November 21, 2011
Received: August 25, 2011
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Posted: August 27, 2011
Tracking No. 80eee3da
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0033

Comment from karen jennings

Submitter Information

Name: karen jennings

Address:

1008 W. Pecan

duncan, oklahoma, United States Minor Outlying Islands, 73533

Email: karendjennings@yahoo.com

General Comment

Iam requesting that you please help us protect our children by changing the torch fuel/lamp oil packaging.

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Tracking No. 80eee4d8
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0034

Comment from Sara Wilson

Submitter Information

Name: Sara Wilson

Address:

309 Plaza Ave.

Dodge City, KS, 67801

General Comment

Packaging torch fuel in see-through, colorfully labeled containers has been responsible for several deaths and injuries. The change that we're asking for is so small, but could save countless lives. My friend tragically lost her baby boy because he mistook torch fuel for apple juice. No mother should ever have to bury her child & as the mother of 2 small boys, myself, I implore you that if there is something that can be done to lessen the danger to my children & children everywhere - such as responsible packaging for torch fuel - that you not hesitate for one moment to protect them.

As of: November 21, 2011 Received: August 25, 2011 Status: Posted Posted: August 27, 2011 Tracking No. 80eebe8 Comments Due: November 16, 2011 Submission Type: Web
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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0035

Comment from Samantha beshears

Submitter Information

Name: Samantha beshears

Address:

102 E. Blair

Wilburton, oklahoma, 74578

Email: samanthabeshears@gmail.com

Phone: (918) 471-9558

General Comment

Tiki Torch Fluid It looks just like Apple Juice it has killed many children out there the color of it needs to be changed or a different container with a better child proof lid please i pray not another childs life is taken from this horrible horrible tiki torch fluid. I pray that this does not take another childs life a childs life should not be taken becuase of the tikki torch fluid it is so sad that it looks just like apple juice. i wished that it didn't i'm very sad that it does and pray we can stop this now!!!!!!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Category: Consumer/Individual
Tracking No. 80eef94e
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0036

Comment from Rachael Verdugo

Submitter Information

Name: Rachael Verdugo

Address:

102 parr

wilburton, OK, 74578

Email: annverdugo@yahoo.com

Phone: 9184659263

General Comment

I think non-see through packaging should be required and child proof lids.

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Category: Consumer/Individual
Tracking No. 80eef988
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0037

Comment from Cari Bashaw

Submitter Information

Name: Cari Bashaw

Address:

3823 East 54th Street

Tulsa, OK, 74135

Submitter's Representative: self

Organization: none

General Comment

Please change packaging requirements so that children can not see inside torch fuel packages. This deadly liquid does not need to look like apple juice, does not need to smell good and certainly does not need to be enticing to young children. There are a thousand reasons tiki fuel containers need to be non-transparent; those reasons are curious toddlers who can't read a label but can see what looks like juice.

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Category: Other
Tracking No. 80ef03ac
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0038

Comment from david ransin

Submitter Information

Name: david ransin

Address:

1650 e. battlefield road
Springfield, MO, 65804

Email: david@ransin.com

General Comment

this would be a very simple and equally effective way to avoid needlessly endangering young children; there is no reason for clear bottles

thanks

david

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Tracking No. 80ef04e3
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0039

Comment from susan cummins

Submitter Information

Name: susan cummins

Address:

5852 e. 22nd street

tulsa, OK, 74114-2316

Email: susancummins1@cox.net

Phone: 918-836-1617

General Comment

To Whom It May Concern,

Please change the marking on ALL bottles that can cause potential harm and death to children, so that these bottles will NOT be attractive them and potentially cause them harm or death!!!!

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Category: Consumer/Individual
Tracking No. 80ef1a51
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0040

Comment from Karen Grant

Submitter Information

Name: Karen Grant

Address:

12401 Smithfield Lane

Oklahoma City, OK, 73173

Email: Karensheercules@cox.net

General Comment

Please change the packaging of this deadly torch fuel to anything other than clear. Save the life of a child!

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Category: Consumer/Individual
Tracking No. 80ef1b7f
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0041

Comment from Kimberly Early

Submitter Information

Name: Kimberly Early

Address:

215 Greenridge Drive

Pensacola, FL, 32514

Email: kearly@bearmanlaw.com

General Comment

The packaging of this product needs to be changed immediately. Products already distributed need to be pulled from the shelves and sent back for re-packaging. I myself have a small child and in her best interest, I am requesting the passage of the proposed rule that the product go to a non-see-through container.

As of: November 21, 2011
Received: August 25, 2011
Status: Posted
Posted: August 27, 2011
Tracking No. 80ef1c06
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0042

Comment from Carmen Troutman

Submitter Information

Name: Carmen Troutman

General Comment

Please change the packaging for the torch fuel & lamp oil, it looks just like apple juice. There should be no reason not to change the packaging as people are losing their lives because of this. The lids are not child proof either, please make them truly child proof. And put clear warnings on the bottles.

Thanks!

As of: November 21, 2011
Received: August 26, 2011
Status: Posted
Posted: August 27, 2011
Category: Consumer/Individual
Tracking No. 80ef4e22
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0043

Comment from Lanita Garrett

Submitter Information

Name: Lanita Garrett

Address:

819 West Nabor

Marlow, OK, 73055

Email: lanitagarrett@yahoo.com

Phone: 580-756-4686

General Comment

Please do something about these bottles. For the protection of our children. Children dont know the difference between Danger and safe. Parents cant be everywhere at one time. Bottles with safty caps should be just that, SAFE. My 2 year old opened it, drank tiki torch and DIED!! Please help all the other children survive. Make these bottle caps really safe. Clear bottles should be frosted so the liquid isnt visible. It looks just like apple juice.

As of: November 21, 2011 Received: August 26, 2011 Status: Posted Posted: August 27, 2011 Category: Consumer/Individual Tracking No. 80ef568a Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0044

Comment from adam odstrcil

Submitter Information

Name: adam odstrcil

Address:

313 nth 2nd

duncan, oklahoma, 73533

Email: adamodstrcil78@yahoo.com

Phone: 580-255-2727

General Comment

hay i have a ? for you rich guys. how many of our babies need to die befor you see your wronge we are just money, but our childrin are not just money .they are the reason for this comment fix it or who needs a tiki tourchs any way get the picture

PUBLIC SUBMISSION

As of: November 21, 2011 Received: August 26, 2011 Status: Posted Posted: August 27, 2011 Category: Consumer Advocacy Organization Tracking No. 80ef6ea6 Comments Due: November 16, 2011 Submission Type: Web
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0045

Comment from Yvonne Bryant

Submitter Information

Name: Yvonne Bryant

Address:

707 W. Elder
Duncan, OK, 73533

Email: yvonne-3@sbcglobal.net

Phone: 580 475 0842

General Comment

Cant you see this is not right, and it must be stoped. this is a danger to so many people why not change the bottle, make it safe for us all. I pray your heart will be moved as mine was and you will help .

As of: November 21, 2011
Received: August 26, 2011
Status: Posted
Posted: August 27, 2011
Category: Consumer/Individual
Tracking No. 80f03e43
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0046

Comment from Paula Jarboe

Submitter Information

Name: Paula Jarboe

Address:

437 Horseshoe Ln.

Gainesville, TX, 76240

Email: p.jarboe@yahoo.com

General Comment

I Believe that is of up most importance to change the packaging on all these oils that are in these see through bottles. Small children who can't read do not know the difference between tiki oil and apple juice therefore if they can not see it they will not be tempted 2 drink from the bottle thank you very much

PUBLIC SUBMISSION

As of: November 21, 2011 Received: August 29, 2011 Status: Posted Posted: August 29, 2011 Category: Consumer/Individual Tracking No. 80f073d4 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0047

Comment from Sandra Haht

Submitter Information

Name: Sandra Haht

Address:

1111 Peoria Ave.

Spirit Lake, GA, 51360

Email: skh1@mchsi.com

Phone: 712-320-2116

General Comment

I am the paternal grandmother of a Natalie Wells

Age 22 months who died as a result of ingesting oil of citronella used in Tiki Torches, on August 2, 2011. This product must be taken regulated better, packaged better or even better completely taken off the market. I absolutely agree with the petition for the new proposed rule..This is a highly dangerous product that affects the lungs almost instantly. Causing death within a short time... I am a registered nurse and have never seen such a dangerous product readily available to the unsuspecting public as this one.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 29, 2011
Status: Posted
Posted: August 29, 2011
Tracking No. 80f073de
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0048

Comment from Jeremy Troutman

Submitter Information

Name: Jeremy Troutman

General Comment

The risk in making a hazardous product look appealing for marketing purposes is dangerous and irresponsible. The manufactures of these product should be thinking safty before profits. If they can not produce a safe product our government should be responsible enough to step in and protect its citizens. I am disgusted with the greed and willful neglect these companies practice in there relentless pursuit of money.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 29, 2011
Status: Posted
Posted: August 29, 2011
Tracking No. 80f07beb
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0049

Comment from EDWARD TOPOR

Submitter Information

Name: EDWARD TOPOR

Address:

3505 SE 8th Ave

Portland, OR, 97202

Email: edtopor@live.com

Phone: 503 310 6281

General Comment

package the stuff in a container that isn't transparent and looks exactly like a juice bottle. Please

As of: November 21, 2011
Received: August 29, 2011
Status: Posted
Posted: August 29, 2011
Tracking No. 80f07d06
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0050

Comment from Winonah Place Lawson

Submitter Information

Name: Winonah Place Lawson

Address:

1658 S. As

Broken Arrow, OK, 74012

Email: rvmamas@netzero.com

Phone: 918.991.9402

Fax: N/A

General Comment

I want packaging changed to be less appealing to children.

As of: November 21, 2011
Received: August 29, 2011
Status: Posted
Posted: August 29, 2011
Category: Consumer/Individual
Tracking No. 80f086ec
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0051

Comment from Melani Hamilton

Submitter Information

Name: Melani Hamilton

Address:

515 N Union Ave

Tulsa, OK, 74127

Email: melani@cox.net

General Comment

Please change the packaging on torch fuel and lamp oil to protect children.

As of: November 21, 2011 Received: August 29, 2011 Status: Posted Posted: August 30, 2011 Tracking No. 80f08854 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0052

Comment from rickey anderson

Submitter Information

Name: rickey anderson

Address:

305 spencer st

same

formosa, KS, 66942

Email: riverratanderson@nckcn.com

Phone: 7857942387

Fax: none

General Comment

i am one of the grandfathers of johnathon bumpas if youve ever been a grandfather or a father then you realise how much ya worry.

and wish you could protect your children.

and its companys like the makers of tiki oil that thinks of nothing but making a profit.

i know changing the way things are made is expensive.

but when it comes to protecting the young there should be no price to high.

what if it was your children id bet things would be changed.

rick&sophie anderson.

grandparents to a beautiful little boy who never got a chance at life.

As of: November 21, 2011
Received: August 29, 2011
Status: Posted
Posted: August 30, 2011
Tracking No. 80f088a0
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0053

Comment from Andrea Musgrave

Submitter Information

Name: Andrea Musgrave

General Comment

put torch oil in a non see through container so children won't mistake it for juice and drink it.

As of: November 21, 2011
Received: August 29, 2011
Status: Posted
Posted: August 30, 2011
Tracking No. 80f089d1
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0054

Comment from Kendra Thompson

Submitter Information

Name: Kendra Thompson

Address:

Tulsa, OK,

General Comment

Please make non-see-through bottles for torch fuel and lamp oil so children will not confuse it with juice and possibly drink it by mistake.

As of: November 21, 2011 Received: August 30, 2011 Status: Posted Posted: August 30, 2011 Category: Distributor Tracking No. 80f08bc2 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0055

Comment from Debra Ince

Submitter Information

Name: Debra Ince

Address:

6503 Dayla Ct.
Granbury, TX, 76049

Email: incedebra@yahoo.com

Phone: 580-736-3706

Organization: tiki toruch fuild

Government Agency Type: Federal

Government Agency: ACF

General Comment

Please help safe a life of another child, It is very heart breaking to lose such a wonderful love as a childs. Please look into this more and help familys with this, Thank you for your time.

As of: November 21, 2011
Received: August 30, 2011
Status: Posted
Posted: August 30, 2011
Tracking No. 80f091b7
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0056

Comment from Allison Radcliffe

Submitter Information

Name: Allison Radcliffe

General Comment

Torch fuel should not be sold in clear bottles due to the confusion for children that it is a drink.

As of: November 21, 2011 Received: August 30, 2011 Status: Posted Posted: August 30, 2011 Category: Manufacturer Tracking No. 80f0923d Comments Due: November 16, 2011 Submission Type: Web
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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0057

Comment from Beth Delancy

Submitter Information

Name: Beth Delancy

Address:

7217 E. 63rd Street

Tulsa, OK, 74133

Email: bdelancy@cox.net

Phone: 9184889656

General Comment

Please don't let another child be hurt by the packaging of this fuel. What an easy change to make to avoid another tragic accident. Please support this ruling.

As of: November 21, 2011
Received: August 30, 2011
Status: Posted
Posted: August 30, 2011
Category: Consumer/Individual
Tracking No. 80f0b00e
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0058

Comment from Vicki Davis

Submitter Information

Name: Vicki Davis

Address:

301 North "A" Street
Duncan, 73533

Email: v.davis99@yahoo.com

Phone: 580-475-7049

General Comment

I personally know a family that lost their child in Oklahoma. I pray that the packaging on this product be changed so that no other child (or any age for that matter) lose their life. The packaging now makes the torch fluid look too much like apple juice in the eyes of a child. PLEASE CHANGE THIS NOW! No other family should endure this kind of senseless loss!!!

As of: November 21, 2011
Received: August 30, 2011
Status: Posted
Posted: August 31, 2011
Category: Consumer/Individual
Tracking No. 80f0ba21
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0059

Comment from Karen Bruns

Submitter Information

Name: Karen Bruns

Address:

223 E. 25th Street
Tulsa, OK, 74114

Email: kfbruns@cox.net

Phone: 918-744-1730

Fax: 918-496-0799

General Comment

Please change the packaging to a dark, non-see through container. It is a shame that defenseless children have died due to this unfortunate oversight. How many more have to die before action is taken?

PUBLIC SUBMISSION

As of: November 21, 2011 Received: August 30, 2011 Status: Posted Posted: August 31, 2011 Tracking No. 80f0bd31 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0060

Comment from Jessica & Rick Baker

Submitter Information

Name: Jessica & Rick Baker

Address:

505 Spencer

Formoso, KS, 66942

Email: jessandrick30@yahoo.com

Phone: 580-470-5797

General Comment

please tell me how you can even consider not changing the packaging of this product when not one, not even two, but several children have lost their lives because they thought this product was something it wasnt. I think that after the first death something would of been done to prevent this from happing to someone else. because nothing was done it resulted in the death of my nephew(joynethan).if this petition is ignored i hope that you can live with the death of a child or children on your shoulders.why ignore this situation? If ignored children and elderly will continue to die. How many more lives will it take to realize that this is a serious issue and needs to be addressed immediately.....

As of: November 21, 2011
Received: August 31, 2011
Status: Posted
Posted: August 31, 2011
Tracking No. 80f0c474
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0061

Comment from Devin Werner

Submitter Information

Name: Devin Werner

Address:

Cimarron, KS,

General Comment

I pray that you would please take this serious and change the bottles and labels. I think that it is a small request to make if it means saving just 1 life. I hope that nobody else has to go through such a tragedy because of something that could have so easily been changed.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: August 31, 2011
Status: Posted
Posted: August 31, 2011
Tracking No. 80f0c4d3
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0062

Comment from Angela Nuckles

Submitter Information

Name: Angela Nuckles

Address:

1827 S shiloh

Wichita, KS, 67207

Email: missnuckles@gmail.com

General Comment

There is no reason for children to be put in this kind of danger. This needs to be corrected immediately.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 01, 2011 Status: Posted Posted: September 01, 2011 Tracking No. 80f0e257 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0063

Comment from Janice Brooks

Submitter Information

Name: Janice Brooks

Address:

440 Clovis Rd

Malvern, AR, 72104

Email: Janny_rie@sbcglobal.net

Phone: 501-818-9371

General Comment

We so need new packaging on this fuel source. How many more innocent lives must be lost?! We are so quick to save a tree or an animal. But what about our greatest resource our children?! We has parents and grandparents do everything that we can to protect our children. Please please please help us by changing the package of this torch fuel! I saw the photo's of the fuel with the apple juice and it is hard to tell them a part and for a child even more so as they can not read labeling. So please once again help us to keep our future leaders and parents and grandparents safe. Change the packaging of this fuel source. And regulations for future sources as well. Thank you for your time

As of: November 21, 2011
Received: September 02, 2011
Status: Posted
Posted: September 06, 2011
Tracking No. 80f0fe37
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0064

Comment from Brent Berry

Submitter Information

Name: Brent Berry

General Comment

This clear bottle for poisonous torch fuel makes it look like something to drink to a child. It needs to be stopped. These bottles are often around children at campouts and picnics and should be packaged so that it looks dangerous and poisonous because it can kill someone who drinks just one drink.

As of: November 21, 2011
Received: September 02, 2011
Status: Posted
Posted: September 06, 2011
Tracking No. 80f0fe48
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0065

Comment from Tonya Walker

Submitter Information

Name: Tonya Walker

Address: United States,

General Comment

As a mother of 3 and a children's pastor to even more kids, I have a heart for kids and their safety. I would like to see packaging changed of harmful products to be less appealing to children.

As of: November 21, 2011
Received: September 02, 2011
Status: Posted
Posted: September 06, 2011
Tracking No. 80f0fe54
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0066

Comment from Maria Gutierrez

Submitter Information

Name: Maria Gutierrez

Address:

Tulsa, OK,

General Comment

I would like to see packaging change of harmful products to be less appealing to children.

As of: November 21, 2011
Received: September 02, 2011
Status: Posted
Posted: September 06, 2011
Tracking No. 80f0febd
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0067

Comment from Karen Lewis

Submitter Information

Name: Karen Lewis

Address:

4339 S Canton Ave
Tulsa, 74135

Email: k.lewisobrien@gmail.com

General Comment

tiki torch fuel packaging needs to be changed. It should be packaged similar to charcoal starter or lighter fluid instead.

As of: November 21, 2011
Received: September 02, 2011
Status: Posted
Posted: September 06, 2011
Category: Consumer/Individual
Tracking No. 80f0ff0a
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0068

Comment from Raymond Allred

Submitter Information

Name: Raymond Allred

Address:

9910 S 67 East Pl

Tulsa, OK, 74133

Email: rallred@carrcarr.com

Phone: 918-392-1017

General Comment

I agree with need for rule change requiring non-see through packaging.

As of: November 21, 2011 Received: September 02, 2011 Status: Posted Posted: September 06, 2011 Tracking No. 80f1047e Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0069

Comment from Cory Wells

Submitter Information

Name: Cory Wells

Address:

3655 240th ave.#25

Spencer, 51301

Email: corycw@smunet.net

Phone: 712-334-4990

General Comment

Pleas recall the Tiki Touch lighter fluid and all similar products. My daughter Natalie Wells who was born on October 1st 2009 was killed on August 2nd 2011 when she mistakenly took Tiki Touch lighter fluid as apple juice. The Tiki Touch fluid comes in a clear plastic jug and the fluid looks very similar to apple juice. It also comes in blue and red that resembles Kool-Aid. Not only does it look like juice it has a pleasant odor to it appealing to children.

There is no reason that such a deadly product needs to be packaged in such a manner. I am begging please have this product recalled before another toddler is needlessly killed. I just got back from a tour in Afghanistan and I only had my beautiful daughter that I was looking forward to getting home to see for 8 days.

Pleas Please recall this thank you Cory Wells we do not want to see any more kids killed in this country by this product.

Attached is a photo of my Daughter who was killed by Tiki Tournch Lighter "oil" while camping at Marble Beach Camp Ground in Spirit Lake Iowa. August 2nd 2011



CLEARED FOR PUBLIC RELEASE
UNDER OP. 5011

As of: November 21, 2011
Received: September 02, 2011
Status: Posted
Posted: September 06, 2011
Tracking No. 80f104bc
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0070

Comment from bonnie wells

Submitter Information

Name: bonnie wells

Address:

3655 240th ave.#25

Spencer, IA, 51301

Email: tiggerboo9@hotmail.com

Phone: 712-346-8254

General Comment

i am the mother of Natalie wells, a 22 month old little girl, who lost her life because she ingested tiki torch fluid. she ingested this fluid because i believe she saw it as apple juice. she is among the thousands that have lost their lives because this product looks like juice, or kool-aid, and had has a sweet smell to it. i don't think its to much to ask that the manufacturer be made to change the look, the smell, the packaging, and the caps of their product. for the rest of my life i have to live without my daughter, i have to wonder what she might have become, or done with her life. these companies only have to live with spending thousands of dollars to make simple changes. these changes have the potential to save thousands more lives.

As of: November 21, 2011
Received: September 02, 2011
Status: Posted
Posted: September 06, 2011
Tracking No. 80f10933
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0071
Comment from paul McClelland

Submitter Information

Name: paul McClelland
Address:
1112 f st
salida,

General Comment

This stuff killed my friends little girl!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 03, 2011
Status: Posted
Posted: September 06, 2011
Category: Other
Tracking No. 80f10a20
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0072

Comment from Kari Handeland

Submitter Information

Name: Kari Handeland

Address:

363 Lindale Dr

I-4

Springfield, OR, 97477

Email: jupiterssoul29@yahoo.com

General Comment

This item needs to be recalled, this packaging is ridiculously close in resembling apple juice...just a target for children to grab for.

As of: November 21, 2011 Received: September 03, 2011 Status: Posted Posted: September 06, 2011 Category: Manufacturer Tracking No. 80f10a21 Comments Due: November 16, 2011 Submission Type: Web
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PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0073
Comment from Carrie Lemons

Submitter Information

Name: Carrie Lemons
Address:
506 11th Street North
Mountain Lake, MN, 56159
Email: carrielemons@rocketmail.com
Phone: 5078225076
Organization: Natty's Day

General Comment

I was with a friend when his 22 mo old daughter accidentally drank tiki torch fluid thinking it was apple juice....she passed away that day changing the lives of people who knew and loved her forever. This is a memory that I will never forget and haunts me daily. I do not wish for anyone else to go through this pain and suffering as I have. So I beg of you to please make it to where the packaging is not see through..Antifreeze has to be in a colored jug why not this stuff?

As of: November 21, 2011
Received: September 03, 2011
Status: Posted
Posted: September 06, 2011
Category: Consumer/Individual
Tracking No. 80f10a65
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0074

Comment from Robin Lock

Submitter Information

Name: Robin Lock

Address:

702 palmer St

Emmetsburg, IA, 50536

Email: lockfam@mchsi.com

Phone: 712-480-2053

General Comment

My 22 month old niece, Natalie Wells from Spencer, Iowa died on August 2, 2011 after accidentally ingesting lamp oil. PLEASE change the packaging so that another family does not have to experience this kind of tragedy!

As of: November 21, 2011
Received: September 03, 2011
Status: Posted
Posted: September 06, 2011
Tracking No. 80f10d1d
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0075

Comment from Christa Johnson

Submitter Information

Name: Christa Johnson

General Comment

I am writing to appeal that packaging containing poisonous/toxic fluids not be in containers that children and others may mistake for juice or Kool-aid. There have been recent incidents where children and others have been poisoned and often died after consuming such fluids, specifically citronella/tiki torch fluid. Though warnings may be on the packaging, parents, and certainly not children, may overlook the dangers such fluids may pose because of the ambiguous packaging. Please save the lives of children and others and mandate a change in the packaging of such hazardous materials.

As of: November 21, 2011 Received: September 03, 2011 Status: Posted Posted: September 06, 2011 Tracking No. 80f10dea Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0076
Comment from Amelia Smith

Submitter Information

Name: Amelia Smith
Address:
1383 Eastview #1
Columbus, OH, 43212

General Comment

Let's keep children safe!

As of: November 21, 2011
Received: September 03, 2011
Status: Posted
Posted: September 06, 2011
Tracking No. 80f10dfe
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0077

Comment from Kelly Stecker

Submitter Information

Name: Kelly Stecker

General Comment

YOU NEED TO RECALL THESE!!! THESE POOR CHILDREN DON'T KNOW ANY BETTER!!!!!!

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 03, 2011 Status: Posted Posted: September 07, 2011 Category: Consumer/Individual Tracking No. 80f10e93 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0078

Comment from Sandy Haht

Submitter Information

Name: Sandy Haht

Address:

1111 Peoria Ave

Spirit Lake, IA, 51360

Email: skh1@mchsi.com

Phone: 712-320-2116

Organization: Iowa Hospice

Redacted Comment

Added by CPSC on 09/07/2011 - This is the 2nd comment from this person. - The initial comment was been posted at CPSC-2011-0048-0047.

Get the product OIL OF CiTRONELLA used in Tiki Torches off the market. It has been responsible in the death of my granddaughter and other small children. The bottles are clear plastic see through containers that come in appealing colors such as yellow, red and green. The caps are known to be defective and there is not enough warning about the danger of the chemicals contained in the poison in the bottle. Please for the sake of saving other lives, get this product in a non see through container with large letters to warn of the danger of the chemical contained in the bottle.

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f12664
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0079

Comment from James Meadows

Submitter Information

Name: James Meadows

General Comment

I believe that if the container was not transparent that children would not be able to see what is in it thinking it was something to drink.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f126cd
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0080

Comment from Danielle Drozd

Submitter Information

Name: Danielle Drozd

General Comment

My little cousin died the day before his 2nd birthday from drinking the lamp oil. Dont let this happen to another baby. Make these packages safer and childproof!!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f12819
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0081

Comment from Ernie Flores

Submitter Information

Name: Ernie Flores

Address: Washington

General Comment

PLEASE, change the packaging on this product. The lives of many innocent children depend on you taking action NOW!!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f12864
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0082

Comment from Tami Davies

Submitter Information

Name: Tami Davies

General Comment

I have two small children and do see the resemblance to apple juice. Please change these containers to be less appealing to children. It's heart-breaking to see the losses this has caused.

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f128a5
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0083

Comment from John O'Connor

Submitter Information

Name: John O'Connor

General Comment

Please change packaging

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 06, 2011 Status: Posted Posted: September 07, 2011 Category: Consumer/Individual Tracking No. 80f128c2 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0084

Comment from Victor Juliana

Submitter Information

Name: Victor Juliana

Address:

4600 Madison

Kansas City, Missouri, 64057

Email: victorjuliana@bradv.com

Phone: 816.960.5026

General Comment

Please provide labeling requirements for liquid fuel makers that are simple to understand and cause a minimal burden on the maker that will alert young children of harm if taken internally. Many products are difficult to distinguish as edible and note edible by children. Liquid such as apple juice and lighter fluids appear very similar when placed on shelves in the home.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f12944
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0085
Comment from Jessica Cox

Submitter Information

Name: Jessica Cox
Address:
Tulsa, OK,

General Comment

Please make the bottles dark so kids won't mistake the liquid for juice and drink it.

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f12953
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0086

Comment from Harlan Schillinger

Submitter Information

Name: Harlan Schillinger

Address:

940 Wadsworth Blvd

Lakewood, Colorado, 80214

Email: harlans@netaff.com

Phone: 303-232-2707

Organization: self

General Comment

Please change the packaging of the torch fuel container. They are dangerous and children can not read them. Parents can not read them either.

Thank you.

Harlan Schillinger

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f12a0b
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0087

Comment from Jonathan Cox

Submitter Information

Name: Jonathan Cox

Address:

Jenks, OK, 74113

General Comment

Please modify the bottles to look less like a bottle of fruit juice. Merely making the bottles opaque should be satisfactory. Death by consumption of lantern fuel is a HORRIBLE fate for a child, and one that's easily prevented.

Thank you for your consideration.

As of: November 21, 2011
Received: September 06, 2011
Status: Posted
Posted: September 07, 2011
Category: Other
Tracking No. 80f12bcb
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0088

Comment from Kris Barmore

Submitter Information

Name: Kris Barmore

Address:

3434 B st

Lincoln, NE, 68610

Email: loonzrus@gmail.com

General Comment

Tiki torch fuel needs to be in opaque containers and sealed with a child proof lid to discourage children mistaking it for apple juice. Thanks

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 07, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f12f32
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0089

Comment from Adam Miller

Submitter Information

Name: Adam Miller

General Comment

Please consider making the containers opaque and requiring a child-proof lid. Parents should also be responsible for their kids and for storing the oil properly.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 07, 2011
Status: Posted
Posted: September 07, 2011
Tracking No. 80f13106
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0090

Comment from Brit Hammer

Submitter Information

Name: Brit Hammer

General Comment

It seems like a simple solution to manufacture opaque bottles for the torch fluid to make the appearance distinctive from apple juice. The child proof top is also important to maintain.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 08, 2011
Status: Posted
Posted: September 13, 2011
Tracking No. 80f1492a
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0091

Comment from Pamela Welch

Submitter Information

Name: Pamela Welch

Address:

OK,

Submitter's Representative: Langford

Organization: Red Rock Video Services, LLC

General Comment

Please Change the Bottle Requirements for packaging Torch Fuel and Lamp Oil.

As of: November 21, 2011
Received: September 09, 2011
Status: Posted
Posted: September 13, 2011
Category: Consumer/Individual
Tracking No. 80f14ef9
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0092

Comment from Cindy Pearson

Submitter Information

Name: Cindy Pearson

Address:

353 N Ridge Ave

Sand Springs, OK, 74063

Email: candlenut@summitdigital.net

Phone: 918-241-2261

General Comment

Please don't let another child die needlessly due to the packaging of tiki torch fuel. Either change the packaging so that it is not see-through or change the color of the fuel so that it does not look like apple juice.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 09, 2011 Status: Posted Posted: September 13, 2011 Category: Consumer/Individual Tracking No. 80f15738 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0093

Comment from Kate Kremer

Submitter Information

Name: Kate Kremer

Address:

226 West Main Street

Mount Sterling, IL, 62353

Email: oeser84@yahoo.com

Submitter's Representative: God Mother

Organization: Natlie Wells

General Comment

I am a family member of Natilie Wells and it is a tragedy that we hope we can change for other people.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 12, 2011
Status: Posted
Posted: September 13, 2011
Tracking No. 80f16eec
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0094

Comment from terry j shafer

Submitter Information

Name: terry j shafer

Address:

111 cathy lane
eufaula, OK, 74432

Email: terryshafer97@yahoo.com

Phone: 1 918 490 1003

General Comment

please change the labeling on you bottles as a mother who has lost a child it is the worst pain you can only imagine

As of: November 21, 2011
Received: September 12, 2011
Status: Posted
Posted: September 13, 2011
Category: Other
Tracking No. 80f170bd
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0095

Comment from Jeff Beene

Submitter Information

Name: Jeff Beene

Address:

8086 S Yale Ave

Tulsa, OK, 74136

Email: jbeene@sbcglobal.net

Phone: 9183613174

General Comment

The fact that these torch fluid bottles look so much like apple juice bottles is outrageous! Make the bottles NOT see-through so kids can't think the liquid is juice and drink it!! The safety caps are not completely reliable, especially if old or left in the hot sun.

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 13, 2011
Category: Consumer/Individual
Tracking No. 80f180d1
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0096
Comment from Brian Huddleston

Submitter Information

Name: Brian Huddleston
Address:
5103 S Sheridan Road
PMB 160
Tulsa, OK, 74145
Email: brianrhuddleston@gmail.com
Phone: (918) 237-3857
Fax: (918) 477-2075

General Comment

If children are drinking torch fuel because it looks like juice, manufacturers should at least change the torch fuel plastic bottles so that young children can't see inside the bottle. Also, the screw cap could be made child proof.

Thanks,
Brian

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 13, 2011
Tracking No. 80f18102
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0097

Comment from Lori Smith

Submitter Information

Name: Lori Smith

Address:

PO box 455

Fort gibson, OK, 74434

Email: Lsmithok@me.com

Phone: 918-478-3262

General Comment

I urge regulations be put in place to prevent any more children from being harmed by torch fuel packaging practices. Such an easy solution to save precious lives!

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f1844b
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0098

Comment from Kent Olson

Submitter Information

Name: Kent Olson

Address:

Poison Control Center

2789 - 25th Street

San Francisco, CA, 94110

Email: olson@clpoison.org

Phone: 415-643-3202

Organization: California Poison Control System

General Comment

I am the Medical Director of a large regional poison control center. I want to endorse Dr Marcus' comments. Lamp oil is extremely hazardous to small children and I support efforts to package it in a way that makes it less appealing to children and more difficult for them to open and ingest. A functioning child-resistant cap is only part of the solution. Smaller container size is also helpful to reduce the likelihood that buyers will pour out smaller quantities into non-childproof containers.

As of: November 21, 2011
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Tracking No. 80f1865e
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0099

Comment from Gayla lindsay

Submitter Information

Name: Gayla lindsay

Address:

OK, 74403

General Comment

Change packaging of torch fuel to keep it from looking like juice!

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f18711
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0100

Comment from Cynthia Ihrke

Submitter Information

Name: Cynthia Ihrke

Address:

10854 Santa Monica Blvd

Los Angeles, CA, 90025

Email: cynthiahrke@yahoo.com

General Comment

Please make the change to torch lighter fuel and lamp oil to non-see-through packaging to protect our children.

Thank you!
Cynthia Ihrke

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f18780
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0101

Comment from Lori wharton

Submitter Information

Name: Lori wharton

Organization: None

General Comment

I think the packaging of tiki torch fuel should be changed so that it is not transparent and less appealing to children.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f187bc
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0102

Comment from Gail Fine

Submitter Information

Name: Gail Fine

Address:

305 McGee Drive
Sallisaw, 74955

General Comment

Please package tiki torch fuel in a container that is opaque. It looks too much like fruit juice and is appealing to children who are not old enough to read. Also, it should not be colored and scented to resemble fruit and apple juice. This is a small thing to ask that could save the lives of so many children.

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f187e0
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0103

Comment from Liz minton

Submitter Information

Name: Liz minton

General Comment

Stop the clear bottles with fuel that looks like apple juice

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f18821
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0104

Comment from Jan Whittiker

Submitter Information

Name: Jan Whittiker

Address:

2417 e Coburn Cr

Muskogee, Oklahoma, Saint Lucia, 74401

General Comment

Change the packaging and save a child's life...please!

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 13, 2011 Status: Posted Posted: September 14, 2011 Category: Other Tracking No. 80f18830 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0105

Comment from gail bomgardner

Submitter Information

Name: gail bomgardner

Address:

809 sw main st
minco, OK,

Email: hoppy1943@hotmail.com

Phone: 4053524183

General Comment

i saw a bottle tiki-type torch fuel at the store last week and i understand how a small child could mistake it for a bottle of juice. a bottle change need to be applied to the product or more young children will mistake it for juice and drink it.

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f188e0
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0106
Comment from Tony Laster

Submitter Information

Name: Tony Laster
Address:
PO Box 21623
Oklahoma City, Oklahoma, 73156
Email: tony_Laster@yahoo.com
Phone: 405-751-8834

General Comment

This product MUST be removed from ALL store shelves as it is presently packaged. Small children can access it in many stores sitting on lower shelves and looks exactly like AppleJuice. This is a very dangerous product and the manufacturers and bottlers must be made to discontinue this packaging practice. Enough harm has come from this product and we need to STOP IT NOW.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f18901
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0107

Comment from Leanne Peters

Submitter Information

Name: Leanne Peters

General Comment

This is an easy rule to support. Preventing the injury or death of any one child would be enough to support this. I cannot imagine the heartbreak of losing a child, especially when it could have been easily prevented. Please - impose new packaging rules to save other families from this devastation!

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 13, 2011 Status: Posted Posted: September 14, 2011 Category: Other Tracking No. 80f18964 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0108

Comment from Becky Wright

Submitter Information

Name: Becky Wright

Address:

P.O. Box 116

Tahlequah, OK, 74465

Email: bwsongs@sbcglobal.net

Phone: 9184562703

Submitter's Representative: Founder & Director, Becky Wright

Organization: Tahlequah Orphan & Adoption Ministries

General Comment

This is a tragedy that could be prevented, with less "attractive" packaging for children, and packaging that in no way resembles something most little ones enjoy: apple juice. I wholeheartedly support the proposal to insist upon non-transparent packaging and a TRULY child-proof lid. As a mom of nine and advocate for children, also wife of a Child Welfare Supervisor with the Oklahoma Dept. of Human Services, we each URGE you to pass this proposal to save the lives of children.

As of: November 21, 2011
Received: September 13, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f189b6
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0109

Comment from Stacey Taylor

Submitter Information

Name: Stacey Taylor

Address:

23801 Barberry Pl.

Murrieta, CA, 92562

Email: webtaylors@msn.com

Phone: 951-326-5784

General Comment

Even 1 child losing their life is too many...but when several are making the mistake over and over it is Obviously more than overdue time to make a change. We need to be responsible and make Whatever changes necessary to keep our children safe.

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f18ad4
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0110

Comment from Evelyn Fugitt

Submitter Information

Name: Evelyn Fugitt

Address:

411 Poplar Place
Sallisaw, OK, 74955

General Comment

For the safety of our children you need to insist that tiki torch fuel is bottled in non-see through containers. It is not right to endanger children who can't read by making fuel look like apple juice. Please consider.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f18adb
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0111

Comment from Michael Fine

Submitter Information

Name: Michael Fine

General Comment

I petition you to bottle tiki torch fuel in containers that are not see through. Please use this safety practice to protect our precious children. It should not increase production costs so why not?

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f193b5
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0112

Comment from Charla Jackson

Submitter Information

Name: Charla Jackson

Address:

2908 east augusya

Muskogee, OK, 74403

Email: Cjackson@Warner.k12.ok.us

Phone: 9188697830

General Comment

Please review the law to make these canisters safe. If we can save lives it is worth it.

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f192a8
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0113

Comment from Robert Key

Submitter Information

Name: Robert Key

Address:

1215 State Hwy 37

Minco, OK, 73059

Email: key67@aol.com

Phone: 4054731846

General Comment

As a parent and grandparent, I wanted to sign this petition to change the packaging of the torch fuel and lamp oil. The way it is now, it looks like apple juice to young kids. Yes the bottles should be put up out of reach of children, but as we all know, children have a knack for getting into things that we never think they could get into. Please changed the color of the oil or the packaging.

PUBLIC SUBMISSION

As of: November 21, 2011
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Status: Posted
Posted: September 14, 2011
Tracking No. 80f1943f
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0114

Comment from Chad Yandell

Submitter Information

Name: Chad Yandell

Address:

108 Wapiti Ln
Poteau, OK,

General Comment

I would like the tiki torch-type fuel packaging to be changed to be less appealing to children.

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f198e0
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0115

Comment from ELIZABETH DIAZ

Submitter Information

Name: ELIZABETH DIAZ

Address:

3204 S ELDER AVE

BROKEN ARROW, OK, 74012

Email: ELIZABETHD@GJCORP.COM

Phone: 9184490830

General Comment

I have juice and drinks on my back porch all the time during the summer while we play in the pool. I also have family gatherings that average a range of 10-20 young children who could easily mistake torch fuel for juice. Altering the packaging should be a minor issue when it comes to the safety of anyone's life.

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f19966
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0116

Comment from Chastity Corbin

Submitter Information

Name: Chastity Corbin

Address:

817 SW 16th Street

Newcastle, OK, 73065

Email: chatitycorbin@yahoo.com

Phone: 405-387-3079

General Comment

Please consider changing the packaging laws for the torch fuel to look different than anything consumable by children. It is unfortunate that the resemblance to apple juice has caused such loss. Thank you.

As of: November 21, 2011 Received: September 14, 2011 Status: Posted Posted: September 14, 2011 Tracking No. 80f1997a Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
 Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
 Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0117
 Comment from Jane Rogers

Submitter Information

Name: Jane Rogers
Address:
 Oklahoma City, OK,

General Comment

I feel that if you have Children or Grandchildren, you would want to protect them, If you don't have children, may be you have loved a niece or nephew or a best friend's child. The tragedy of losing a child no matter how old is devastating, to lose one so young I don't know how you would even overcome it. I am posting this comment so that the company of the Torch Fuel and Lamp Oil will change it's packaging. The packaging is very deceiving, like satan, that packaging can kill, steal and destroy. How many Children have to suffer? I say No More. Change the Packaging.

As of: November 21, 2011
Received: September 14, 2011
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Posted: September 14, 2011
Tracking No. 80f199dc
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0118

Comment from Amelia Houston

Submitter Information

Name: Amelia Houston

General Comment

I want the tiki torch packing to be changed to be less appealing to children. And to not look like apple juice.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 14, 2011 Status: Posted Posted: September 14, 2011 Category: Consumer/Individual Tracking No. 80f19a31 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0119

Comment from Kim DeWeese

Submitter Information

Name: Kim DeWeese

Address:

12507 S. Birch Ave.
Jenks, OK, 74037

Email: deweesemk@sbcglobal.net

Phone: 918-296-9784

General Comment

Please change the packaging on this product. It's such a simple thing to do that can prevent so many unnecessary deaths.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f19b39
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0120

Comment from michael durham

Submitter Information

Name: michael durham

Address:

2643 east albany street
apartment B

Broken arrow, OK, 74014

Email: horizon.mdurham@windstream.net

Phone: 918-607-4984

General Comment

Please change the containers to not look like apple juice bottles. Thanks

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f19bb9
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0121

Comment from doss briggs

Submitter Information

Name: doss briggs

General Comment

the CPSC is here for a reason, and that is to protect consumers. w/ over 15k deaths, it is dissappointing that the CPSC has not stepped up their efforts to resolve this tragic issue. NOW is the time for the CPSC to fix this problem? what if it was your child?

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f19bfe
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0122

Comment from Steve Shoemake

Submitter Information

Name: Steve Shoemake

Address:

11716 S Willow Pl
Jenks, OK, 74037

General Comment

Please start requiring non-see-through packaging for the torch fuel and lamp oil. I looked in my closet and found some, and I can see the appeal it has for kids. It seems like a simple change that wouldn't cost the companies that manufacture it too much, and it's a very small price to pay for even one child's life.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f19cb3
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0123

Comment from Todd Shepler, MD

Submitter Information

Name: Todd Shepler, MD

Address:

3705 Medical Pkwy
Suite 120
Austin, TX, 78705

General Comment

Please change the packaging for Torch fuel and lamp oil. It looks far too similar to apple juice. Thanks.

Dr. Todd R. Shepler

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f19dd9
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0124

Comment from Nikki McCutchen

Submitter Information

Name: Nikki McCutchen

Address:

Jenks, OK, 74037

General Comment

I want packaging changed to be less appealing to children.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f19f48
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0125

Comment from Barry Whitewater

Submitter Information

Name: Barry Whitewater

Address:

3403 High Vista Drive
Dallas, TN, 75234

General Comment

I can see no reason why this item has to be sold in a clear bottle. Please sell this in a non-transparent bottle.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f19f75
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0126

Comment from Kim Leitch

Submitter Information

Name: Kim Leitch

General Comment

The packaging for the torch fuel & lamp oil must be changed so that it is never again mistaken for anything that a child might think is ok to drink or ingest.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Tracking No. 80f19fdd
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0127

Comment from Carol Barham

Submitter Information

Name: Carol Barham

Address:

9412 Gary

Fort Smith, AR, 72903

Email: maxinejr@sbcglobal.net

General Comment

Partys that turn to the death of the innocent...not much different than drug parties. What a shame!!!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f1a07c
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0128

Comment from Leslie White

Submitter Information

Name: Leslie White

Address:

5512 S. 67th E. Ave.

Tulsa, OK, 74145

Email: lcwhite2@cox.net

Phone: (918) 524-3329

General Comment

The solution to this problem is ridiculously simple.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 14, 2011
Category: Consumer/Individual
Tracking No. 80f1a1d0
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0129

Comment from Miranda Wescott

Submitter Information

Name: Miranda Wescott

Address:

1714 W 109th St S
Jenks, 74037

Email: miranda@cfr-ins.com

Phone: 918-299-8337

General Comment

Please, as a mother, I urge you to change the type of packaging in which the tiki torch fuel is placed. Even one child's death was too many. I know that you will do the right thing.

Thank you -

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 14, 2011 Status: Posted Posted: September 14, 2011 Tracking No. 80f1a37a Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0130

Comment from Lauren Anderson

Submitter Information

Name: Lauren Anderson

Address:

Broken Arrow, OK, 74014

General Comment

I am asking that the label and container for the Tiki fuel and lamp oil be changed. Kids are very visual and they associate clear bottles with that same color liquid as apple juice. The children do not know any better and they think they are drinking their juice. We need to protect them, where they can not protect themselves because they can not read yet. Creating a bottle that is not see through eliminates that color recognition in a child and changing the label are just two simple ways we can take away the child's association of juice to the Tiki fuel and lamp oil. We should be doing everything we can to protect the future leaders of our country. I ask that you take these children into consideration and change the label and containers.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 14, 2011 Status: Posted Posted: September 14, 2011 Category: Consumer/Individual Tracking No. 80f1a4c8 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0131

Comment from Emily Hill

Submitter Information

Name: Emily Hill

Address:

5437 East

Tulsa, OK, 74114

Email: emilydhill@cox.net

Phone: 918-855-9689

Fax: none

General Comment

I would think the safety of our population would be among the top factors when choosing a package for products. It would seem to me that if this "confusion" over apple juice and tikki torch fuel has been predominant that the obvious answer is to change the packaging of the tikki torch fuel.

Granted packaging of products is a very serious marketing issue; but hopefully the safety of consumers is more serious.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 14, 2011 Status: Posted Posted: September 14, 2011 Category: Consumer/Individual Tracking No. 80f1a91f Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0132

Comment from Lou Ann Cacy

Submitter Information

Name: Lou Ann Cacy

Address:

241 S 183rd E Ave

Tulsa, OK, 74108

Email: gramma27gkidz@cox.net

Phone: 918-234-3105

General Comment

One child's death from drinkings Tiki Torch fluid is one too many. That there are others is inexcusable. Something must be done to prevent further deaths. A change of the packaging seems to be a good, safe way to insure that innocent children will not be subjected to the temptation of drinking this deadly fluid.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 14, 2011 Status: Posted Posted: September 14, 2011 Category: Consumer/Individual Tracking No. 80f1a98a Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0133

Comment from Jim McKinney

Submitter Information

Name: Jim McKinney

Address:

12947 E. 182nd St. South

Bixby, OK, 74008

Email: jimckinney13@gmail.com

Phone: 918-366-4476

General Comment

We need to do everything within our power to protect our children. Is there anything more important than them?

Please have the labeling on tiki-torch fuel changed so that it doesn't look like something a child would want to drink.

Thank you.

Jim McKinney

A very concerned parent and grandfather

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Category: Other
Tracking No. 80f1ac62
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0134

Comment from Jon Seekins

Submitter Information

Name: Jon Seekins

Address:

2015 S. Darlington Avenue
Tulsa, OK, 74112

General Comment

Changing the packaging seems like a no brainer. What is taking so long to figure this out? Adults who purchase lamp oil will get it and buy the appropriate product, children on the other hand, act more impulsively and as it has been shown mistake this produce for something to drink. Please pass the appropriate legislation to require the manufacturers, distributors, etc. to make the containers opaque and add simple labeling. Really no one buys lamp oil for the packaging they buy the cheapest price and it's got to be cheaper to make solid colored containers then see threw.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1ac85
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0135

Comment from Michelle Steinke

Submitter Information

Name: Michelle Steinke

Address:

2008 Amherst Ln SE

Conyers, GA, 30094

Email: mich3ll35@hotmail.com

General Comment

Please change the regulations on the packaging of this product and require less-appealing to children and childproof/tamper proof packaging to keep this from happening to more children.

Also, the inclusion of a skull and cross bones, something that a child could clearly see would be beneficial too.

Thank You

Michelle Steinke

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 14, 2011 Status: Posted Posted: September 15, 2011 Category: Consumer/Individual Tracking No. 80flaca2 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0136

Comment from Teena Hillburn

Submitter Information

Name: Teena Hillburn

Address:

3030 w 79th St
Tulsa, OK, 74132

Email: thillburn@farmeragent.com

Phone: 918-622-1515

Fax: 918-622-5891

General Comment

Please change the packaging on the torch fluid to prevent all children from mistaken it for fruit juice. I am a previous daycare provider and can understand how a child could mistake these bottles.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Category: Consumer/Individual
Tracking No. 80f1add
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0137

Comment from Cecilia Wessinger

Submitter Information

Name: Cecilia Wessinger

Address:

6504 A South Memorial Dr

Tulsa, OK, 74133

Email: cecilia_wessinger@yahoo.com

General Comment

This is such an easy 'fix' to insure our children are safe. Please change the packaging and take a positive step towards protecting children from harm.

Thank you.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80flae16
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0138

Comment from Jacqueline Van Fleet

Submitter Information

Name: Jacqueline Van Fleet

Address:

1140 S. Columbia Ave.

Tulsa, 74104

Email: jackievanfleet@gmail.com

General Comment

Yes, please accept my support of legislation that will cause lamp oil manufacturers to change and child-proof their packing.

Ideally, this stuff should be put in containers similar to those used for household bleach, such as Clorox.

The lid is tamper-proof and the bottles are opaque.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1af7c
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0139

Comment from Paul Naylor

Submitter Information

Name: Paul Naylor

General Comment

Please save lives and protect the defenseless children by mandating a change in the structure, design and labeling of this dangerous product.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1b071
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0140

Comment from Jaime einhorn

Submitter Information

Name: Jaime einhorn

Address:

7044 springer run

Edmond, ok, 7:012

General Comment

Container should definitely be changed. The similarity to apple juice is insanelly similar. Please do your part to keep our children safe.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1b2a9
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0141

Comment from Leah Anthony

Submitter Information

Name: Leah Anthony

Address:

2204 FM 145

Hart, TX, 79043

General Comment

Please change the packaging requirements for torch fuel. After seeing the comparison photo, I can see how a small child could confuse the fuel for apple juice. The container should be solid so that the fuel cannot be seen just like other fuel containers, such as charcoal lighter fluid and gasoline.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1b370
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0142
Comment from Debbie Gwartney

Submitter Information

Name: Debbie Gwartney
Address:
1405 E. 130th Pl. S.
Jenks, OK, 74037
Email: dgwartney@cox.net

General Comment

Please change the packaging of Tiki Torch Fuel to be less appealing for children and will not be mistaken for juice.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Category: Consumer/Individual
Tracking No. 80f1b38c
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0143
Comment from Martha Cantrell

Submitter Information

Name: Martha Cantrell
Address:
2946 S. Detroit
Tulsa, OK, 74114
Email: martha@cmgadv.com
Submitter's Representative: John Sullivan

General Comment

Please pass the law changing the packaging for torch fuel to make it safe for children.

As of: November 21, 2011 Received: September 14, 2011 Status: Posted Posted: September 15, 2011 Tracking No. 80f1b6bf Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0144

Comment from Jacob Rains

Submitter Information

Name: Jacob Rains

Address:

818 W Oklahoma

Blackwell, OK, 74631

General Comment

My name is Jacob Rains and I believe that packaging changes must be made to tiki torch oil bottles. My son recently ingested a small amount of torch fuel that resulted in chemical pneumonia. Thankfully' he is fine now but the result could have been much worse. The torch fuel my son ingested was in a bottle very similar to the bottles of juice that we buy every week. My son sees us pouring his juice from this bottle almost daily and it is no surprise that when he saw the bottle of torch fuel he immediatley believed it to be the juice that he drinks all the time. In the first several minutes he began to have labored breathing and discolored lips. When we arrived at the local ER they could not handle this level of emergency, so they sent us to a larger hospital 90 minutes away. The doctors at the larger hospital were very close to putting him on a ventilator, but thankfully he was in better shape than other children in his situation have been. We were in the hospital for 5 days and very worried about our child the whole time. I firmly believe that his accident and so many other incidents around the country could be avoided simply by changing the packaging of one product. Please, don't allow this terrible tragedy to ever occur again

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1b907
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0145
Comment from Vickie Pannell

Submitter Information

Name: Vickie Pannell
Address:
P o Box 471
Checotah, OK, 74426

General Comment

Please change the labeling on your bottles. How many babies have to die before you do something. Please stand up and help these families.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1b9cb
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0146

Comment from Rochelle Collins

Submitter Information

Name: Rochelle Collins

Address:

1756 Kingfisher DR
Joplin, MO, 64804

Email: tearyzlea1@yahoo.com

Phone: 4172086215

General Comment

Please pass this law we need to save our children from dangerous packaging of harmful chemicals.

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1ba47
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0147
Comment from sheila baade

Submitter Information

Name: sheila baade
Address:
5711 homestead rd
arlington, TX, 7617

General Comment

This packaging needs changed

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Category: Consumer/Individual
Tracking No. 80f1ba8f
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0148

Comment from Bill Copeland

Submitter Information

Name: Bill Copeland

Address:

1611 S. Utica #271

Tulsa, OK, 74104

Email: mission.horticulture@cox.net

Phone: 918-232-5752

General Comment

No reason to make anything complicated out of this issue. Please require the manufacturers of Tiki Torch fuel to do what they should have been doing all along, and use containers that are child-safe.

Thanks,

Bill Copeland

Tulsa, OK

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Category: Other
Tracking No. 80f1ba9c
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0149

Comment from Marilyn Ingle

Submitter Information

Name: Marilyn Ingle

Address:

4330 So Lakewood Ave

Tulsa, OK, 74135

Email: mingle41@cox.net

General Comment

It is important that we do all we can to make our children safe in all areas. I feel that we need to make the labels on Torch Fuel and Lamp Oil so children will not be attracted to the label. Sometimes the color or label itself is inducive to children. Please work on this for the safety of my grandchildren which I have a newborn and he will be facing these issues in the future.

Respectfully,
Marilyn Ingle

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1bdd3
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0150

Comment from Brent Douglas

Submitter Information

Name: Brent Douglas

General Comment

I think these bottles should be made to look like poison, not juice. This is deadly enough that no child should ever be able to open it and it should look like it is dangerous to a 2 year old.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1be4f
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0151

Comment from Trisha Barrett

Submitter Information

Name: Trisha Barrett

Address:

5301 w fern mt road
muskogee, OK, 74401

Email: tttbarrett@yahoo.com

Phone: 9185770905

General Comment

I am asking that the packaging and the cap be changed on this product due to the lives of young children. I dont believe that 2 cents per cap is too much to ask when it will spare the life of a child.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 14, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1bf7d
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0152

Comment from Shannon Bowman

Submitter Information

Name: Shannon Bowman

General Comment

Please change the packaging on all tikkitorch containers of fuel. This incident should never happen to innocent children who simply make a mistake and think it is their favorite juice. It saddens me to think that our sweet babies are not protected from something that is so easy to change. How many other families should lose thier precious child, sister, brother , nephew, niece or grandbaby?

As of: November 21, 2011 Received: September 15, 2011 Status: Posted Posted: September 15, 2011 Category: Consumer Advocacy Organization Tracking No. 80f1c7b8 Comments Due: November 16, 2011 Submission Type: Web
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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0153

Comment from James M. Branum

Submitter Information

Name: James M. Branum

Address:

4 NE 10th St.

Ste. #411

Oklahoma City, OK, 73104

Email: girightslawyer@gmail.com

Organization: Oklahoma Chapter of the National Lawyers Guild

General Comment

I am writing to express my support for this new regulation. No parent should have to go through the needless horror of seeing their child die in such a horrific way.

I've seen the tiki oil sold in stores and it does look just like an apple juice bottle. Any young child who isn't old enough to read yet would assume that this in fact apple juice.

Please do the right thing and stop this needless danger from continuing to occur!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 15, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1c8fd
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0154

Comment from Lauren Farrah

Submitter Information

Name: Lauren Farrah

General Comment

It is imperative to child safety that manufacturers of torch fuels and tiki oils implement opaque containers.

Children, especially toddlers and preschoolers, lack the ability to assess risk. The clear containers that contain these oils look too similar to the bottles that children are very familiar with: fruit juices.

Even worse than poisoning, these oils are extremely deadly when ingested by coating the lungs and preventing breathing. Death is quick and little can be done to once the child swallows these liquids.

Please push forward in this proposal. The lives of children have no price tag.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 15, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1c9d7
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0155

Comment from Melanie Blocker

Submitter Information

Name: Melanie Blocker

General Comment

PLEASE. Change the packaging on the see-through bottles for torch fuel and lamp oil to not look like apple juice containers! My grandchildren would certainly think it was apple juice and try to help themselves to a taste. I don't think it's too much to ask to make the change considering what is a stake here - the lives of our precious children!

As of: November 21, 2011
Received: September 15, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1c9dc
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0156

Comment from Katie Sallee

Submitter Information

Name: Katie Sallee

Address:

9918 N 118th East Ave

Owasso, OK, 74055

Email: katiesallee@aol.com

General Comment

torch fuel products should be sold only in non-transparent containers

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 15, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1ca5a
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0157

Comment from Sally Estrada

Submitter Information

Name: Sally Estrada

Address:

803 4th st.

Alamogordo, 88310

Email: sallyran2010@yahoo.com

Phone: 5754153514

General Comment

How many children have to die before it becomes important enough to the government to change the packaging on this torch fuel? Why not package it in the same manner as other fuels such as Coleman, in a can where it belongs. It's an obvious problem, what if it were your child or family member? Please fix this before anymore tragedies occur.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 15, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1ca73
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0158

Comment from Dan Branum

Submitter Information

Name: Dan Branum

Address:

Houston, TX, 77047

Email: seekingtruthnow@yahoo.com

General Comment

Torch Fuel shouldn't be sold in a clear bottle with bright coloring added to the fuel. While there are "child-proof" caps, obviously sometimes those will fail and sometimes they will be left off. It seems like Torch Fuel should be treated more like gasoline and other dangerous fluids.

As of: November 21, 2011
Received: September 15, 2011
Status: Posted
Posted: September 15, 2011
Category: Consumer/Individual
Tracking No. 80f1cb4e
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0159
Comment from Timothy Hummel

Submitter Information

Name: Timothy Hummel
Address:
P.O. Box 1184
Oklahoma City, OK, 73101
Email: tim@hummellawoffice.com
Phone: 405-319-0300
Fax: 405-319-0350
Organization: Hummel Law Office

General Comment

I support the Petition. It is obvious that the lamp oil can be confused with apple juice in its current packaging. The packaging must change. Also, the smell and taste may need to change.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 15, 2011 Status: Posted Posted: September 15, 2011 Category: Other Tracking No. 80f1cce8 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0160

Comment from Laura Hazen

Submitter Information

Name: Laura Hazen

Address:

312 S. National Blvd.

Ft. Gibson, OK, 74434

Email: laura_hazen@yahoo.com

General Comment

In 2006 my 18 month old son drank lamp oil that was packaged in a clear container. This was from a oil candle for carved Halloween pumpkins. It looked very much like a child's sippy cup full of water, and it is very similar to tiki torch fuel lamps. My son, was rushed to the hospital and then taken by ambulance to Tulsa. The oil apsirated into his lungs from vomiting and caused him to have pneumonia. Thankfully he survived this ordeal, and has no lasting effects. PLEASE INCLUDE THE OIL LAMPS/CANDLES FOR HALLOWEEN PUMPKINS IN THIS ACTION. (They are exactly the same as tiki candles!) I will help in any way that I can to support this cause!! Thank you. Our hearts go out to the Bumpas family for their loss. I cant imagine.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 15, 2011 Status: Posted Posted: September 15, 2011 Tracking No. 80f1ccfa Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0161

Comment from Christa Branum

Submitter Information

Name: Christa Branum

Address:

Oklahoma City, Oklahoma,

General Comment

Young children are dying and becoming seriously hurt when they see torch fuel and think it is apple juice. Please change the law so the companies are required to put it in a non-see through container. This change could save kid's lives.

PUBLIC SUBMISSION

As of: November 21, 2011
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Status: Posted
Posted: September 15, 2011
Tracking No. 80f1d132
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0162

Comment from Kristie Weeaks

Submitter Information

Name: Kristie Weeaks

Address:

Duncan,

General Comment

Tiki Torch fluid kills children!! This needs to change!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 15, 2011
Status: Posted
Posted: September 15, 2011
Tracking No. 80f1d174
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Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0163

Comment from Victoria Henderson

Submitter Information

Name: Victoria Henderson

Submitter's Representative: N/A

Organization: N/A

Government Agency Type: Local

Government Agency: N/A

General Comment

My friends child was killed on his second birthday after ingesting tiki torch fuel. He mistook the fuel for apple juice.

This type of fuel needs to be bottled differently so little ones in the future do not make the same mistake. An accident like this could happen to anyone.

Thank you,
V. Henderson

PUBLIC SUBMISSION

As of: November 21, 2011
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Posted: September 15, 2011
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Tracking No. 80f1d386
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0164

Comment from jessica hudson

Submitter Information

Name: jessica hudson

Address:

517 w chesnut ave
duncan, OK, 73533

Email: hudson_04_08@yahoo.com

Phone: 580-786-0927

General Comment

i believe the first time a child had died from this fluid being in familiar containers as apple juice something should of been taken care of, it has not only happened to one child but many now... its not fair to have to pay that close attention to the differences u should put them in a can like most gas!!! this will never happen to another child if we can help it!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 15, 2011
Status: Posted
Posted: September 15, 2011
Category: Other
Tracking No. 80f1d393
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0165

Comment from scotty hudson

Submitter Information

Name: scotty hudson

Address:

517 w chesnut ave
duncan, OK, 73533

Email: teamzocu@yahoo.com

Phone: 5807860927

General Comment

i really think its crap that we are even having to sign this petetion! this should of been taken care of when the first mistake was made.. children these days r independant and try getting stuff without help, many who cant read yet, so easily could be mistaken, put gas in a can not in plastic juice bottles!

PUBLIC SUBMISSION

As of: November 21, 2011
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Category: Other
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Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0166

Comment from barbara JONES

Submitter Information

Name: barbara JONES

Address:

1005 n th 5th street
duncan, OK, 73533

Email: izahottie@yahoo.com

Phone: 5806566444

General Comment

if many children r dying from this mistake shouldnt everyone be considered. it dosent matter if it is a cute lil bottle and makes the product look good, its gas thats dangerous thats put into the same containers of juice products kids drink. it should be put into another container!

PUBLIC SUBMISSION

As of: November 21, 2011
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Posted: September 15, 2011
Tracking No. 80f1d3c7
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0167

Comment from carol howard

Submitter Information

Name: carol howard

Address:

1814 west Main str.

1814 west Main str.

Duncan, OK, 73533

Email: lynnehoward7559@yahoo.com

Phone: 5804752011

General Comment

I know this family personally. I have seen the grief they have suffered, over the death of jhonathan. I have seen the battle they are going thre to save another child or person from the same out come. I believe the changes should be made so everyone is safe.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 15, 2011 Status: Posted Posted: September 15, 2011 Tracking No. 80f1d447 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0168

Comment from Debbie Cole

Submitter Information

Name: Debbie Cole

Address:

456 Hitch Trail
Satanta, 67870

Email: littlepiggy2626@yahoo.com

Phone: 620-275-7869

General Comment

I looked at the two bottles and they must be changed due to many young children think they are apple juice . I know this MOM that is fighting for the sake of other Children .So please find a way to STOP this for many other people. My heart and prayers go out to all families that have lost a child due to the problems of Toch Fuel and Lamp Oil .Change the shape of the bottles and put a lid on that is hard for a Young Child to get off ! C ome up with a different soultion .

PUBLIC SUBMISSION

As of: November 21, 2011
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Posted: September 15, 2011
Tracking No. 80f1d64f
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0169

Comment from Cheryl Kenney

Submitter Information

Name: Cheryl Kenney

Address:

1015 east 146 st
Glenpool, OK, 74033

Email: Godsblessings12@gmail.com

Phone: 9183212427

General Comment

Please change the packaging of this type of fuel. The life of one child is as important as 10. This is as important as any other poison. Please make your container not transparent and change the aroma and color as not to be confusing for children.

PUBLIC SUBMISSION

As of: November 21, 2011
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0170

Comment from Maia Weaver

Submitter Information

Name: Maia Weaver

General Comment

As a care provider to over 100 children, I ask you to consider changing the packaging for torch fuel and lamp oil. Most of the children in my care cannot read that a dangerous substance is contained within, nor would they care once they opened the package and smelled the contents.

PUBLIC SUBMISSION

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Posted: September 15, 2011
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Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0171

Comment from nici galvan

Submitter Information

Name: nici galvan

Address:

116 w. elder
duncan, OK, 73533

Email: nicigalvan@gmail.com

General Comment

its sad it takes loosing lifes to get this changed

PUBLIC SUBMISSION

As of: November 21, 2011
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0172

Comment from Jeremy Luce

Submitter Information

Name: Jeremy Luce

Address: Oklahoma City,

General Comment

Several toddlers dying or being seriously injured after drinking lamp oil thinking it was apple juice is enough to warrant a regulation regarding the issue. Having young children myself, I can see how easy it would be for a child to make this mistake. Please take action on this!

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 15, 2011 Status: Posted Posted: September 15, 2011 Tracking No. 80f1dce9 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0173

Comment from Hannah Granata

Submitter Information

Name: Hannah Granata

Address:

1809 N Billen Ave

Oklahoma City, OK, 73107

Email: hannah@ericgranata.com

Phone: 405-613-5079

Submitter's Representative: none

Organization: None

Government Agency Type: Local

Government Agency: none

General Comment

This is an easy thing for the manufacturers to do and could save lives. As the mother of four young children, I am very concerned about this issue. The packaging is so similar to juice that it would be indistinguishable for my kids that haven't learned to read yet, and they are often scented to smell appetizing. Please don't hesitate to act in this matter. Thanks!

As of: November 21, 2011 Received: September 15, 2011 Status: Posted Posted: September 16, 2011 Tracking No. 80f1ddf9 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0174

Comment from Tiffany Davis

Submitter Information

Name: Tiffany Davis

Address:

1931 NW 35th Street

Oklahoma City, OK, 73118

Email: tiffybug@cox.net

Phone: 405-524-9785

General Comment

What a simple fix to save lives! Just do it!

PUBLIC SUBMISSION

As of: November 21, 2011
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Category: Consumer/Individual
Tracking No. 80f1de41
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0175

Comment from Charli Lau

Submitter Information

Name: Charli Lau

Address:

2517 NW 22nd Street

Oklahoma City, OK, 73107

Email: charli_lau@yahoo.com

Phone: (405) 595-9958

General Comment

I agree that the clear bottle for torch fuel and lamp oil is dangerous because it looks like juice to children; and I support the request for non-see-through bottling for torch fuel and lamp oil. It may also be a good idea to have a child-proof cap on the bottles.

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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0176

Comment from Brent Fine

Submitter Information

Name: Brent Fine

General Comment

I for one see this as a no brainer. All that is being request is to use a tint to color your bottle so children don't mistake your product for juice and drink it. Please just color your container so it is not mistaken as a juice product container. I camp a lot and have used your product myself. Camping and at a lake cabin. It serves a purpose and will not keep me from buying it in a colored container. If you choose to not change the color I will just buy a different product that serves the same purpose. It will tell me that you could care less about my children and more that change bothers you.

Regards,

Brent

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 15, 2011 Status: Posted Posted: September 16, 2011 Tracking No. 80f1e079 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0177

Comment from Sean Stenlake

Submitter Information

Name: Sean Stenlake

Address:

n/a

n/a, CA, n/a

Email: seanstenlake@yahoo.com

Phone: 714-415-4351

Fax: n/a

Submitter's Representative: n/a

Organization: n/a

Government Agency: n/a

General Comment

Something needs to be done immediately to have the manufacturers change the packaging of these products. These torch oil/fuel containers are too easily mistaken to be juice by children, which is causing hundreds to thousands of injuries and even deaths.

This is such a simple solution of manufacturing this product in a non-see-through container.

How many young children have to be harmed to do something about this?

I can only hope and pray that something will be done soon.

PUBLIC SUBMISSION

As of: November 21, 2011
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Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0178

Comment from Amy Upchurch

Submitter Information

Name: Amy Upchurch

General Comment

A friend of mine was absolutely devastated when a visiting toddler got a hold of her tiki torch fuel and drank it- one sip had horrific effects!

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Received: September 15, 2011
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Tracking No. 80f1e2e1
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Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0179

Comment from Brian Dodd

Submitter Information

Name: Brian Dodd

Address:

2405 Mallard

Duncan, OK, 73533

Email: bsdodd@msn.com

Phone: 580-695-4704

General Comment

Please change the package. One child is one to many to lose.

PUBLIC SUBMISSION

As of: November 21, 2011
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Posted: September 16, 2011
Tracking No. 80f1e4f7
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0180
Comment from CHERYL browder

Submitter Information

Name: CHERYL browder
Address:
705 N.5TH.ST.
DUNCAN, 73533
Email: tinkerbell2869@cableone.net

General Comment

PLEASE WE NEED A CHANGE BEFORE WE LOSE MORE BEAUTIFUL CHILDREN
THANK YOU!!!

As of: November 21, 2011
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Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0181

Comment from Kaylene Munson

Submitter Information

Name: Kaylene Munson

Address:

OK,

General Comment

Please require manufacturers of torch fuel to change their packaging so that children do not mistake fuel for juice. ...seems like a no-brainer!

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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0182

Comment from Elise Bailey

Submitter Information

Name: Elise Bailey

Organization: American Association of Poison Control Centers

General Comment

See attached file(s)

Attachments

AAPCC Comment_CPSC-2011-0048_16Sep2011

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comments for Docket Number CPSC-2011-0048

*Submitted by
American Association of Poison Control Centers*



Richard C. Dart, MD, PhD, President
Alvin C. Bronstein, MD, Director of Toxicosurveillance
Dan Spyker, MD, PhD
Elise Bailey, MSPH, Associate Director of Toxicosurveillance

The American Association of Poison Control Centers (AAPCC) appreciates the opportunity to comment on "Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil" (Consumer Product Safety Commission [CPSC] Docket Number CPSC-2011-0048). In this document we present data on human exposures to Lamp Oil as reported by the AAPCC's National Poison Data System (NPDS).

1. BACKGROUND

AAPCC is a non-profit, national organization founded in 1958. AAPCC is a member-based association that represents the 57 US regional poison centers and the mission of promoting poison prevention and treatment. In addition, AAPCC is the accrediting body for all 57 regional poison centers, each of which is a member of AAPCC.

The regional poison centers' case management systems are linked by the National Poison Data System (NPDS), which is owned and operated by AAPCC. As a requirement for accreditation, regional poison centers are required to submit standardized case data on every exposure call managed to NPDS in near real-time (2009 median time to upload = 19 minutes), creating the only comprehensive poisoning exposure surveillance database in the U.S.

Initiated in 1985, NPDS has over 51 million case records and data on over 360,000 products. In addition, this advanced database is used to detect and track poison exposure outbreaks across the country – methodologically searching for and analyzing exposure trends ranging from adverse drug events, chemical exposures, and food contamination to biological warfare agents.

Annually, the 57 U.S. regional poison centers manage over 4.2 million calls, which include over 2.5 million human exposures (acute and chronic medical events). Members of the public, health care providers and emergency responders spontaneously call regional poison centers to report exposures, to request medical toxicological consults, and to obtain initial toxicological information when responding to poison exposures. All exposures are followed where practicable until resolution of the acute event, and this routine telephone follow-up allows regional poison centers to collect data on patient outcome and clinical effects.

Calls placed to U.S. regional poison centers are managed by healthcare professionals (medical and clinical toxicologists, registered nurses, doctors of pharmacy, pharmacists, chemists, hazardous materials specialists, and epidemiologists) who have received specialized training in toxicology and managing exposure emergencies.

Specialists in Poison Information (SPIs) collect information as calls are managed and enter call data contemporaneously into a standardized electronic data collection system. The AAPCC NPDS Reference Manual contains definitions for every data field.

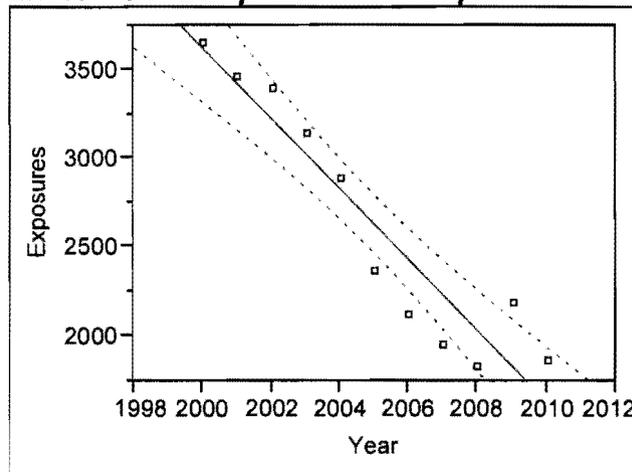
For reference, SPIs use a CD-ROM based software program called Poisindex[®] (Micromedex[®] Healthcare Series for Windows[®] Greenwood Village, CO: Thomson Reuters [Healthcare] Inc.). Poisindex has information on more than 360,000 chemical and household products to assist in the management of calls. Each product is coded to one or more up-to-date management documents that describe the product's ingredients with appropriate treatment recommendations. In addition, each product is assigned a unique product code in Poisindex and is sorted into a system of 975 AAPCC Generic codes, which are maintained by Poisindex. In times of outbreaks or emerging infectious or chemical problems, products can be added to the database for immediate use, allowing for early tracking of public health events. Cases associated with various products can be identified in the NPDS database by querying the database on Poisindex product or AAPCC Generic codes.

2. DATA

All Ages:

Between 2000 and 2010, NPDS reports a total of 28,945 human exposures to Lamp Oil products. Human exposures to Lamp Oil decreased over time, with 3,658 reported in 2000 and 1,876 reported in 2010.

Figure 1: Bivariate Fit of Lamp Oil Human Exposures in NPDS, All Ages



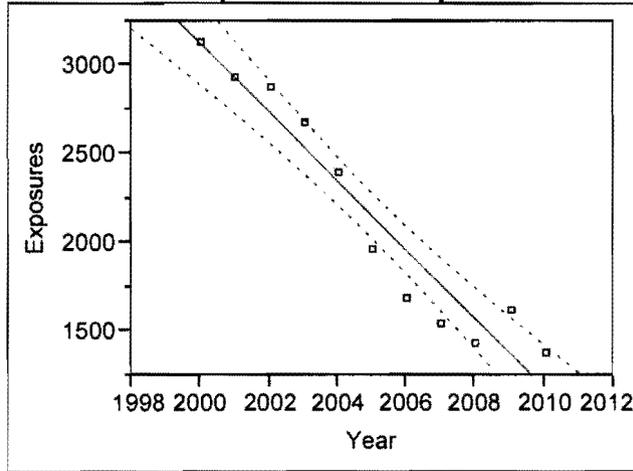
Nine of these exposures (0.03%; range = 0 – 2 deaths per year) were associated with a fatality, seven of which were associated with exposures in children 0 – 6 years.

Children 0 – 6 years:

During this same time period, there were 23,705 exposures in children 0 – 6 years, and seven deaths (0.03%; range = 0 – 2 deaths per year) associated with exposures to Lamp Oil.

Exposures to Lamp Oil in children 0 – 6 years is also decreased over time, with 3,141 reported in 2000 and 1,378 reported in 2010.

Figure 2: Bivariate Fit of Lamp Oil Human Exposures in NPDS, 0 – 6 years



3. Summary

Despite the decreasing number of calls regarding these products, serious injury and death after exposure to Lamp Oils continues to be reported. A review of these cases suggests that children mistake the Lamp Oil products for juice.

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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0183

Comment from judith moman

Submitter Information

Name: judith moman

Address:

greenfield, ma, 01301

General Comment

Please change fuel packages to resemble something deadly- rather than something nourishing.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 16, 2011 Status: Posted Posted: September 16, 2011 Tracking No. 80f1f204 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0184

Comment from Jessica Neely

Submitter Information

Name: Jessica Neely

Address:

16095 franklin St.

P.O.Box 235

Laurelville, OH, 43135

Phone: 1-740-652-8619

General Comment

This shouldn't of happend. After looking at the picture i do see how a kid could mistake it for juice and the fact that the safty cap never worked made it worst. This should not ever happen agian and it takes people like them to make it happen

PUBLIC SUBMISSION

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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0185

Comment from Laina Fetherolf Rogers

Submitter Information

Name: Laina Fetherolf Rogers

Address:

Laurelville, 43135

General Comment

As a mother of small children, I can easily see why they would be confused by this container. Surely the expense of different packaging is worth it to the company to avoid this lethal confusion.

PUBLIC SUBMISSION

As of: November 21, 2011
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0186

Comment from katrina ayers

Submitter Information

Name: katrina ayers

Address:

OH, 43135

General Comment

I think that this is a good idea. and the markers of this product should of had small children in mind and even the older people. I have a 2 in half year old and almost one year old. and seeing this product pictured with juice bottle. its understandable why these children think its juice. you know that the people that made these bottle have to have children. why didnt they put to and to together and be hey our bottle look like the juice bottles. maybe we shouldnt make the bottle or the liquid look like a juice bottle or the jucie its self. i couldnt and dont want to think of someone losen a child or my own child due to product makers nothing thinking. with everything being made people need to think off the children and elderly and see if they would think that this would be something that would be taken in the wrong way.

PUBLIC SUBMISSION

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Status: Posted
Posted: September 16, 2011
Tracking No. 80f1f485
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0187

Comment from Kayla Tohn

Submitter Information

Name: Kayla Tohn

General Comment

We should never lose anyone be it child or elder because they went to drink juice and it was fluid for a torch. I love apple juice as does one of my friends daughters, I don't want to lose her because of a case of mistaken identity with her favorite juice. Change needs to happen so we don't lose even more people to careless mistakes like this.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 16, 2011
Status: Posted
Posted: September 16, 2011
Category: Consumer/Individual
Tracking No. 80f1f500
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0188

Comment from Linda Arnett

Submitter Information

Name: Linda Arnett

Address:

2225 S Rockford Ave

Tulsa, OK, 74114

Email: larlin2@cox.net

Phone: 918 851-3694

General Comment

Please change this misleading dangerous consequences packaging to NON-SEE Through for Torch Fuel and Lamp Oil!!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 16, 2011
Status: Posted
Posted: September 16, 2011
Tracking No. 80f1f7da
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0189

Comment from Karin Lackey

Submitter Information

Name: Karin Lackey

General Comment

I am amazed and dismayed that torch fuel and lamp oil are allowed to be sold in packaging that allow them to resemble juice. This is not just a danger for small children, but also for older people with cognitive impairments. My elderly father-in-law has dementia and we have to be vigilant about what he is exposed to. He is fully capable of removing a "child-proof" cap, but does not always have the ability to discern what is consumable. Please require packaging for these products that will ensure the safety of both our children and the elderly. Thank you!

PUBLIC SUBMISSION

As of: November 21, 2011
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Posted: September 16, 2011
Tracking No. 80f1f9db
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0190

Comment from Brooke Hammock

Submitter Information

Name: Brooke Hammock

Address:

730 S. Shepherd
Mustang, OK, 73064

Email: bhammock@carrcarrokc.com

General Comment

As a mother to be honest before I didnt even think about how close this looks to Apple Juice but now I am ABSOLUTLY Terrified to have it anywhere close to my home, my son gets him own apple juice out of the refrigrator and I can see him grabbing this bottle thinking it is Apple Juice. Now I ONLY buy the one that isin the DARK GREEN container.

PUBLIC SUBMISSION

As of: November 21, 2011
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Posted: September 16, 2011
Tracking No. 80f1f9fd
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0191

Comment from Wilson Grider

Submitter Information

Name: Wilson Grider

General Comment

As a father to younger kids, I cannot imagine going through such a senseless tragedy. We have camped in the past and used Torch Fuel but considering the unnecessary dangers; we will not use it again until the product is changed. Please consider this change, as it is a necessity.

PUBLIC SUBMISSION

As of: November 21, 2011
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Status: Posted
Posted: September 16, 2011
Tracking No. 80f1fa89
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0192

Comment from Paul Kouri

Submitter Information

Name: Paul Kouri

Address:

11221 E I240 Service Rd
Oklahoma City, OK, 73150

Email: boulis@cox.net

Phone: (405) 741-1430

General Comment

Please pass the proposed rule. The story in the petition about little Jhoneythan Bumpas is heartbreaking. Even more tragic he's not the only child to have died as a result of this problem. The rule is an easy fix for a very tragic situation. Thanks.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 16, 2011
Status: Posted
Posted: September 16, 2011
Tracking No. 80f1fb13
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0193

Comment from Jennifer Waldron

Submitter Information

Name: Jennifer Waldron

Address:

OK,

General Comment

It is so sad that young children are put in harms way everyday because they are so innocent and don't know any better. Please change the bottles of the tiki torch fluid to something that is less appealing to young children.

As of: November 21, 2011
Received: September 16, 2011
Status: Posted
Posted: September 16, 2011
Tracking No. 80f1fb17
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0194

Comment from Marci Singleteary

Submitter Information

Name: Marci Singleteary

General Comment

Please change the packaging for the torch fuel, such an easy fix; and such tragic results when a child thinks this is apple juice.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 16, 2011
Status: Posted
Posted: September 16, 2011
Tracking No. 80f1fba5
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0195

Comment from martha hammock

Submitter Information

Name: martha hammock

Address:

mustang, OK, 73064

Email: martha3615@cox.net

General Comment

I BELIEVE THIS IS A SIMPLE MATTER FOR THE MFG. CHANGE THE COLOR,
PLEASE

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 16, 2011
Status: Posted
Posted: September 16, 2011
Tracking No. 80f1fbf8
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0196

Comment from Matthew Sill

Submitter Information

Name: Matthew Sill

General Comment

I urge you to take action and save lives!

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 16, 2011 Status: Posted Posted: September 19, 2011 Category: Consumer/Individual Tracking No. 80f1ff9f Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0197

Comment from Karen Hammock

Submitter Information

Name: Karen Hammock

Address:

3710 N. Ironwood Place

Broken Arrow, Oklahoma, 74012

Email: kchammock@aol.com

Phone: 918-519-6686

General Comment

Please help save lives, please make tikki torch packaging non-see thru so small children don't mistake this potentially deadly liquid enticing to these kids.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 17, 2011 Status: Posted Posted: September 19, 2011 Tracking No. 80f20639 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0198

Comment from Greg Smart

Submitter Information

Name: Greg Smart

Submitter's Representative: Individual

Organization: Individual

General Comment

We have a four year old and a one year old in our family. We have become aware of how innocent in appearance the current packaging of torch fuel is such that both the container, and even more so the contents, look virtually identical to apple juice and its containers. Through some brief research, we have noticed that there have been deaths and serious injuries as a result of toddlers mistakenly drinking the torch fuel apparently thinking it is apple juice, or some other type of juice.

Please, and respectfully, before any more toddlers are either killed or injured, we strongly urge you to consider putting regulations in place so the containers and contents are marked sufficient to prevent future injuries. Some suggestions: the packaging could be non-see through, the contents could have a foul odor such that it is not appealing; and the contents could be a different color such that one does not confuse it with apple juice, or some other type juice i.e. maybe black in color.

Thank you in advance for taking action before it is too late for another family and their loved ones.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 17, 2011
Status: Posted
Posted: September 19, 2011
Tracking No. 80f20661
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0199

Comment from Ann Smart

Submitter Information

Name: Ann Smart

Address: Oklahoma

General Comment

We have a couple of small children in our household. We have become aware of a death in Oklahoma due to the packaging of some torch fuel resembling apple juice. Further online research has revealed that apparently there have been deaths and severe injuries in other locations across the U.S.

Please, before any more children are killed or injured, change the packaging, and its contents, so that it does not resemble some type of juice product. Kids cannot tell the difference.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 18, 2011
Status: Posted
Posted: September 19, 2011
Tracking No. 80f20a24
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0200

Comment from elise goodman

Submitter Information

Name: elise goodman

General Comment

please change the packaging of your fuel products so there will be no more confusion of it being a apple juice container. Safety caps would also be appropriate.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 18, 2011
Status: Posted
Posted: September 19, 2011
Tracking No. 80f20aa6
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0201

Comment from Laura Holcomb

Submitter Information

Name: Laura Holcomb

Address:

238 Foster Road

Tewksbury, MA, 01876

Email: lauraa1212@hotmail.com

Phone: 978-851-5398

General Comment

My niece passed away at 22 months old because she drank torch fuel that looked like juice. Help prevent anyone else from having to feel the pain my sister and Brother-in-Law must endure everyday. Please change the packaging to save the lives of other young children

As of: November 21, 2011
Received: September 18, 2011
Status: Posted
Posted: September 19, 2011
Tracking No. 80f20abc
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0202
Comment from Brian Donnelly

Submitter Information

Name: Brian Donnelly

General Comment

PLease change the packaging so no other children mistake the fuel for juice and die like my niece did

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 18, 2011
Status: Posted
Posted: September 19, 2011
Tracking No. 80f20d07
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0203

Comment from Diana Imposimato

Submitter Information

Name: Diana Imposimato

General Comment

Please recall all non-see through packaging for torch fuel and lamp oil. Making a non-see through package for tiki torch fuel will prevent children in the future in mistaking it for juice. This change will prevent children deaths in the future.

As of: November 21, 2011
Received: September 18, 2011
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Posted: September 19, 2011
Tracking No. 80f20dda
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0204

Comment from Patricia Chiaramonte

Submitter Information

Name: Patricia Chiaramonte

Address:

27 Ferncliff Avenue
Saugus, MA, 01906

Email: patricialal@comcast.net

Phone: 781-760-6467

General Comment

I have friends who have lost a child due to this product.

Parents and others need to be aware of the dangers regarding this product.

As of: November 21, 2011
Received: September 18, 2011
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Posted: September 19, 2011
Tracking No. 80f2110b
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0205
Comment from ROGER GANN

Submitter Information

Name: ROGER GANN

General Comment

A regulation should be put in place requiring that torch fuel should be packaged such that the package and its contents should not resemble apple juice containers.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 18, 2011 Status: Posted Posted: September 19, 2011 Category: Consumer/Individual Tracking No. 80f21226 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0206

Comment from heather brown

Submitter Information

Name: heather brown

Address:

19026 e raven drive
queen creek, 85142

Email: numberonewife@hotmail.com

General Comment

I am a mother of five children. Not a day goes by that I don't thank God that they have remained healthy and safe, but I consider myself lucky and blessed because it only takes a moment for tragedy to strike. No parent can monitor all their children or even one child every second of every day. With that in mind, accidents can happen and a baby drinking something that he/she thinks is a safe liquid is a tragic accident that can only be prevented from happening again by manufacturers taking extra precautions. As a parent, I wouldn't store a dangerous liquid in a bottle that used to contain or looks anything like it contains a food or beverage. If I did and my child drank it then I would be held liable and most likely be punished to the fullest extent of the law for neglect or abuse or worse! Why then is it okay for a company to put a dangerous liquid in a container that to a child who cannot read looks and appears just like something mommy or daddy would take out of the refrigerator and serve him a cupful? Children need adults protection. That means supervision (which like i said is impossible to do 24-7) AND added precautions such as infallible childproof bottles and making the bottles designed in a way that they do not appear anything like a food or beverage item. Warnings should also be clearly visible and large enough that you cannot possibly miss the warning. As adults we take things for

granted- like the ability to read and the ability to know the difference between edible and non-edible. Children are learning and exploring and have not developed common sense or the needed skills to protect themselves and therefor as adults we can easily overlook things that are clearly dangerous because to us they are not. Changing the package appearance, and a simple reminder on the bottle, along with other precautions such a very safe and child-proof lid can and will go a long way in saving lives. This could happen to any child and it's not fair!!! Do something, please!

As of: November 21, 2011
Received: September 18, 2011
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Posted: September 19, 2011
Category: Consumer/Individual
Tracking No. 80f213b3
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0207

Comment from Margaret Gann

Submitter Information

Name: Margaret Gann

Address: OK

Submitter's Representative: none

Organization: none

Government Agency Type: Local

Government Agency: none

General Comment

Packaging of torch fuel and lamp oil should be in an opaque or non-transparent container. This liquid not only resembles juice when in a clear container; but also resembles Kool Aid and other fruity drinks frequently consumed by children. A child proof or child resistant container is not enough to stop many children from tirelessly attempting to open a container that they believe contains a sugary sweet drink.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 18, 2011
Status: Posted
Posted: September 19, 2011
Tracking No. 80f2190d
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0208

Comment from Robert Needham

Submitter Information

Name: Robert Needham

Address:

30423 South Hwy.71
Quinton, OK, 74561

Phone: 818-459-3105

General Comment

Packages need to be changed so a small child will not think it is something to drink

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 18, 2011 Status: Posted Posted: September 19, 2011 Category: Other Tracking No. 80f21d28 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0209

Comment from Susan Cummins

Submitter Information

Name: Susan Cummins

Address:

5852 E. 22nd Street

Tulsa, OK, 74114-2316

Email: susancumins1@cox.net

Phone: 918-836-1617

General Comment

To Whom It May Concern,

PLEASE make the packaging on bottles LESS appealing to children!!!! PLEASE!!!! It is bad enough a child died. PLEASE help prevent this from happening again!!! PLEASE!!!!

Thank You,

Susie Cummins

As of: November 21, 2011
Received: September 19, 2011
Status: Posted
Posted: September 19, 2011
Tracking No. 80f21efa
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0210

Comment from Shannon Holcomb

Submitter Information

Name: Shannon Holcomb

Address:

88 Chandler St

Arlington, MA, 02474

Email: orangespaz@hotmail.com

Phone: 7818790765

General Comment

Changing the bottles that torch fuel and lamp oil are put into is so important!!! My 22 month old niece Natalie lost her life because she drank torch fluid thinking it was "apple juice" all because of the see through bottle. Ask you to change the bottle to a non see through bottle so other children do not mistake it as "apple juice" like my niece did.

As of: November 21, 2011
Received: September 19, 2011
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Posted: September 19, 2011
Tracking No. 80f21fb3
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0211

Comment from david queen

Submitter Information

Name: david queen

Submitter's Representative: scott brown

Organization: 401st chemical company

Government Agency: federal

General Comment

The fact that this was not in place killed the young niece of my soldier and something needs to be done before it happens again!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 19, 2011
Status: Posted
Posted: September 19, 2011
Tracking No. 80f2219b
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0212

Comment from Amanda Trembley

Submitter Information

Name: Amanda Trembley

General Comment

I am petitioning see through packaging for torch fuel and lamp oil. IT SHOULD NOT BE SEE THROUGH... Children will think that it is juice and drink it.

As of: November 21, 2011 Received: September 19, 2011 Status: Posted Posted: September 19, 2011 Tracking No. 80f228f3 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0213

Comment from Edward Bottei

Submitter Information

Name: Edward Bottei

Address:

401 Douglas Street
 Sioux City, IA, 51101

Email: BotteiEM@StLukes.org

Phone: 712-279-3732

Organization: Iowa Statewide Poison Control Center

General Comment

As the medical director of a poison center, a medical toxicologist and a critical care physician, I strongly agree that there must be a packaging change for torch fuel and lamp oil. A few weeks ago, a toddler from Iowa died after ingesting tiki torch fuel. The child aspirated the fuel (got it into the lungs) and died precipitously only a few hours after the ingestion.

These packaging for these products need to be changed so they do not appear similar to apple juice or any other food product. Child-resistant caps are not enough for these products as this Iowa death and other previous deaths attest to.

As of: November 21, 2011
Received: September 19, 2011
Status: Posted
Posted: September 19, 2011
Category: Other
Tracking No. 80f229c8
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0214

Comment from LISA SUTERA

Submitter Information

Name: LISA SUTERA

Address:

25 5TH AVENUE

QUINCY, MA, 02169

Email: LISA.SUTERA@YAHOO.COM

Phone: 978-397-8544

Government Agency Type: Federal

General Comment

Please stop this type of packaging. My friend lost a young family member to drinking this.

As of: November 21, 2011
Received: September 19, 2011
Status: Posted
Posted: September 20, 2011
Category: Consumer/Individual
Tracking No. 80f22df5
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0215

Comment from Janice Watson

Submitter Information

Name: Janice Watson

Address:

3414 W. Okmulgee

Muskogee, OK, 74401

Email: janice@economypharmacy.com

Phone: 918-686-1021

Fax: 918-682-3416

General Comment

Please change the packaging for torch fuel and lamp oil. Please make non-see-through so young children won't be tempted to drink it thinking it's apple juice. This will save lives!

Janice Watson

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 20, 2011 Status: Posted Posted: September 20, 2011 Tracking No. 80f2413c Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0216

Comment from Linda Needham

Submitter Information

Name: Linda Needham

Address:

1406 N. 6th St.

Perry,

Email: nananeedham@yahoo.com

Phone: 580-336-5570

General Comment

I seriously think the packageing needs to be changed, I had never really thought alot about how much the packaging looks like apple juice, I think if anyone young or old would put a bottle of the tiki oil and a bottle of apple juice side by side I don't think you could tell the difference. Please do not let another child loose their life because of this, please change the packaging before someone else has to suffer the loss of a loved one.

Thank you

Linda Needham

As of: November 21, 2011 Received: September 20, 2011 Status: Posted Posted: September 20, 2011 Tracking No. 80f24272 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0217

Comment from Ginger Berry

Submitter Information

Name: Ginger Berry

Address:

408 S Silver leaf Dr
Moore, OK, 73160

Email: gingertaylor04@hotmail.com

Phone: 580-656-4924

General Comment

Please change the tiki torch fuel packaging so that this doesnt happen again to an innocent child.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 20, 2011
Status: Posted
Posted: September 20, 2011
Tracking No. 80f2496c
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0218

Comment from Debbie Nielsen

Submitter Information

Name: Debbie Nielsen

Address:

51037 S 700 rd

Colcord, OK, 74338

Email: deb_crimson_lady@yahoo.com

General Comment

Please Fix this problem this is a very serious problem and could be your child or grandchild, it is very scary thing and needs fixed. Please ... Thank you Deb

As of: November 21, 2011
Received: September 20, 2011
Status: Posted
Posted: September 20, 2011
Category: Consumer/Individual
Tracking No. 80f24a24
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Submission Type: E-mail

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0219
Comment from Gary Montgomery

Submitter Information

Name: Gary Montgomery
Address: United States,

General Comment

See Attached

Attachments

Comment from Gary Montgomery

Heggs, Angela

From: Center, Information
Sent: Monday, September 19, 2011 11:54 AM
To: OS - Office of the Secretary
Cc: Wolfson, Scott; Filip, Alexander; Fleming, Nychelle
Subject: FW: Message from Email Form

Todd,

Please note the information below as comments.

Thank you,

mlj

From: emailform@cpsc.gov [mailto:emailform@cpsc.gov]
Sent: Saturday, September 17, 2011 4:52 PM
To: Center, Information
Subject: Message from Email Form

09/17/2011 16:51:58

Name = Gary Montgomery
Organization/Affiliation = previously, Sunbeam Plastics
Daytime Phone = 321-525-7377
E-mail address = garyvmont@gmail.com

Message = please enact rules to prevent hazzardous chemicals from being packaged in colors and containers that make one think it is good to drink...especially to small children. these look appealing to me so i can imagine what small children think. they don't have to be drink like pleasing to the eye to stand out and promote a sale. i can't imagine the costs would be more than a penny or two. i wish they would ask us the consumer before they do these thing. maybe the one or two cents savings gets them a bonus. that's capitalism for you.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 20, 2011
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Tracking No. 80f24be8
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Submission Type: Web

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0220
Comment from Brenda Basden

Submitter Information

Name: Brenda Basden
Address:
PO Box 93
Crowder, OK, 74430
Email: ok_bkbasden@yahoo.com
Phone: 918-334-6295

General Comment

Bottles need to provide cover of contents so children will not assume it is a fruit beverage. Why not do all that can possibly be done to protect an innocent life, especially a child's life.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 20, 2011
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Posted: September 21, 2011
Category: Other
Tracking No. 80f25145
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Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0221

Comment from Amy Willhite

Submitter Information

Name: Amy Willhite

Address:

1110 W Park Ave

Duncan, 73533

Email: amywillhite@yahoo.com

Phone: 580-656-0231

General Comment

Tikki torch fluid kills children, the bottle looks like apple juice. The container needs to be changed!!

As of: November 21, 2011
Received: September 21, 2011
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Posted: September 22, 2011
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Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0222

Comment from Jodie Grogan

Submitter Information

Name: Jodie Grogan

Address:

43436 Ruben Rivers Rd
Tecumseh, OK, 74873

General Comment

CHANGE THE BOTTLE!!! What if this was your child???? It is death in the form of apple jusice!! Tikki lamp fluid KILLS!!!

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 21, 2011 Status: Posted Posted: September 22, 2011 Tracking No. 80f25f4e Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0223

Comment from Jennifer Barnes

Submitter Information

Name: Jennifer Barnes

General Comment

I want the packaging for torch fuel and lamp oil to be changed so it will be less appealing to children to be mistaken for juice. There have been too many incidents relating to this matter. It is too easily mistaken, not only for small children but for anyone. Its common sense not to share a similar packaging with things that are completely different in nature.

PUBLIC SUBMISSION

As of: November 21, 2011
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0224

Comment from stephanie Koonce

Submitter Information

Name: stephanie Koonce

Address:

1012 w pine
duncan, OK, 73533

General Comment

They should change the packaging. I will never buy this product and will tell everyone I know not to either.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 21, 2011 Status: Posted Posted: September 22, 2011 Tracking No. 80f26b74 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0225

Comment from Crystal Combs

Submitter Information

Name: Crystal Combs

Address:

1150 34th St

#10 D

Missoula, MT, 59801

Email: udevilish@yahoo.com

Phone: 406-493-6362

General Comment

Please consider this petition. It stands on good merits and is backed by a good heart in which this family does not want to see another mother have to bury her child. We cannot stop all accidents from happening, but it is our responsibility to ensure we protect the children of this world. It is not asking alot of these companies to ask that they do their best, in every possible way, to protect our children.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 21, 2011 Status: Posted Posted: September 22, 2011 Tracking No. 80f26c04 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0226

Comment from Rachel DeWitt

Submitter Information

Name: Rachel DeWitt

General Comment

I remember the day that we received word that this had happened to Jhonethyn and how I cried out to God for his little life. I have a little boy that is only about nine months younger and Betsy would always send us the clothes Jhonethyn had outgrown. I remember that horrible day, I held a little set of clothes that had belonged to Jhonethyn and I cried and cried. Its hard to believe that this could happen so easily and that this could be so deadly. It is beyond me that something has not been done sooner to prevent something so lethal from being so accessable. I strongly believe that something should be done before more children die.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 21, 2011
Status: Posted
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Tracking No. 80f26c49
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Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0227

Comment from Sharon Rogers

Submitter Information

Name: Sharon Rogers

General Comment

We are personal friends with this family and were overwhelmed by the news of little Jhonethyn's death and how quickly his life was snuffed out before it had even really started. I have a grandson not much younger than Jhonethyn and I was, and am still so moved by this. I beg you on behalf of Grandmothers who have lost their precious little angels and those who still hold theirs tight, Please do something to change this deadly poison from taking anyone elses babies or grandbabies.

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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0228

Comment from stephanue totten

Submitter Information

Name: stephanue totten

General Comment

Please help keep our kids safe!

As of: November 21, 2011
Received: September 21, 2011
Status: Posted
Posted: September 22, 2011
Tracking No. 80f26d78
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Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0229

Comment from Lori Farr

Submitter Information

Name: Lori Farr

Address:

5932 Sky road

Joshua, 76058

Email: lef0304@juno.com

Phone: 817-309-4382

General Comment

For the sake of other parents and grandparents repackage toxins in white bottles like charcoal lighter fluid. If they are not attractive to little ones, they are less likely to be curious about what is inside.

As of: November 21, 2011
Received: September 22, 2011
Status: Posted
Posted: September 22, 2011
Category: Consumer/Individual
Tracking No. 80f27152
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0230
Comment from Sally Richter

Submitter Information

Name: Sally Richter
Address:
3105 165th Lane NE
Ham Lake, MN, 55304
Email: AJBear01@msn.com
Phone: 763-331-0378

General Comment

I agree--tiki torch fuel packaging should be changed so it is not mistaken for an edible substance.

My suggestion: Put the fuel into a black plastic container with a big picture of fire on the label--after all that is what it is for, right? How would that be appealing to drink?

As of: November 21, 2011
Received: September 22, 2011
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Posted: September 22, 2011
Category: Manufacturer
Tracking No. 80f279a2
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0231

Comment from Pratap Varma

Submitter Information

Name: Pratap Varma

Address:

W140 N4900 Lilly Road

Menomonee Falls, WI, 53051

Email: pvarma@lamplight.com

Phone: (262) 781-9590

Fax: (262) 781-6774

Submitter's Representative: Quality Director

Organization: Lamplight Farms, Inc.

General Comment

Please see attached document.

Attachments

Comment from Lamplight Farms, Inc.



September 22, 2011

Via Federal eRulemaking Portal (www.regulations.gov) and Hand Delivery

Office of the Secretary
U.S. Consumer Product Safety Commission
Room 502
4330 East West Highway
Bethesda, MD 20814

Re: Docket No. CPSC-2011-0048, Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil (PP 11-1)

Dear Secretary:

As a company that could be impacted by the outcome of a Consumer Product Safety Commission ("Commission") determination on the above-captioned petition, Lamplight Farms Incorporated ("Lamplight") appreciates this opportunity to provide comments on the petition.

Lamplight is a leading provider of outdoor torches, citronella fuel, outdoor wax candles, indoor oil lamps, lamp oil and related goods. Lamplight is also the owner of the internationally recognized TIKI[®] brand, which has been in commerce since 1956, with one of its premiere products being its famous TIKI[®] brand torches.

Initially, we stress that some comments on the petition have incorrectly or mistakenly made reference to the TIKI[®] brand. We would like to assure the public that Lamplight's TIKI[®] brand products were not connected with the petitioner's tragedy. We thank the Commission and its staff for recognizing that torch fuel and lamp oil are a category of goods separate from the TIKI[®] brand. We request the public's help to avoid confusion by being mindful of our registered TIKI[®] trademark and to reference the category of goods as simply torch fuel and lamp oil.

We fully support efforts to protect children from accidental exposure to hazardous substances and are in compliance with provisions of the Poison Prevention Packaging Act and the Federal Hazardous Substances Act designed to reduce and eliminate such risks.

Labels make important information available to consumers, and our products have clear warnings on the front and back using the signal word "DANGER" to alert consumers, including parents, to the serious personal injury that may result from ingesting the product. Lamplight makes additional warnings not to drink the product and to keep out of the reach of children. When these warnings are respected, the risk of harm is significantly reduced.

Lamplight Comment

Page 2

Docket No. CPSC-2011-0048

September 22, 2011

Further, because due care is not always exercised by consumers, Lamplight packages its torch fuel and lamp oil in child-resistant packaging as required by the Commission. A child-resistant cap creates a barrier between the child and the substance in the container. We note that the petitioner alleges in her civil complaint for damages against the manufacturer of the product involved that the child-resistant packaging was defective. When child-resistant packaging functions properly, a barrier prevents ingestion and subsequent potential injury. We are unaware of any cap failures on Lamplight products.

Accordingly, Lamplight embraces reasonable standards that improve child-safety, and it does not oppose the Commission initiating a rulemaking to consider whether to require non-see-through containers for torch fuel and lamp oil.

As stated in the Commission's notice on the petition, 76 Fed. Reg. 44506 (July 26, 2011), the Poison Prevention Packaging Act does not authorize the Commission to prescribe specific packaging designs. 15 U.S.C. § 1472(d). In the case of household substances for which special packaging is required, the Commission may prohibit the packaging of such substances in packages that it determines are unnecessarily attractive to children, if certain additional requirements are met, including feasibility, practicability, and appropriateness for the substance. *Id.* Should the Commission determine to propose a rule, we would suggest that a proposed rule simply prohibiting the packaging of torch fuel and lamp oil in clear or transparent containers would adequately address the matter.

If, after a notice-and-comment rulemaking, the Commission determines to issue a rule prohibiting see-through containers for torch fuel or lamp oil, Lamplight requests that the Commission establish an effective date no sooner than one year from the date the rule is promulgated. The manufacturing practices of the industry vary widely, and the schedule from product development to packaging may already be in process at the time such a rule is promulgated, thus requiring the maximum allowable time for the clearance of that inventory and for planning. In that regard, changes in tooling, molding, and manufacturing costs must be taken into account for a large volume of products.

Once again, Lamplight appreciates this opportunity to comment. We look forward to participating further in any rulemaking process and encourage the Commission and staff to contact us should additional information be desired.

Sincerely,



Pratap Varma

Quality Director

Lamplight Farms Incorporated

As of: November 21, 2011
Received: September 22, 2011
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Posted: September 22, 2011
Tracking No. 80f27ab7
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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0232

Comment from Kevin Osterhoudt, MD, MS

Submitter Information

Name: Kevin Osterhoudt, MD, MS

Address: United States,

Submitter's Representative: Kevin Osterhoudt, MD, MS

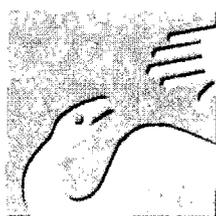
Organization: The Poison Control Center - The Children's Hospital of Philadelphia

General Comment

See Attached

Attachments

Comment from Kevin Osterhoudt, MD, MS



T H E P O I S O N C O N T R O L C E N T E R

July 27, 2011

Office of the Secretary
U.S. Consumer Product Safety Commission
Room 502
4330 East West Highway
Bethesda, MD 20814

Received CPSC
2011 AUG -5 A 9:34
Office of the Secretary
FOI

Re: Docket # CPSC-2011-0048, PP11-1

Dear CPSC,

This letter offers my support for CPSC rulemaking towards the goal of requiring “torch fuels” and “lamp oils” and similar products to be packaged in opaque containers which are not attractive to children.

I agree that the current clear plastic packaging of these fuels is overly attractive to children. A reporter from a local network news affiliate, for a broadcast news story, took a bottle of lamp oil out onto the street and showed it to children – they predominantly identified the fuel as “apple juice.” I showed a bottle of lamp oil to my own son and he identified it as “apple juice.” And, when preparing to talk about this issue with a group of legislators, I almost had an unknowing congressman pour himself a glass of torch fuel to drink (luckily, I stopped him). A discussion of the dangers of hydrocarbon products to children, including a photo of the attractive nature of a “lamp oil” at a picnic table, can be found in a paper that I co-authored (Mazzeo PA, Renny M, Osterhoudt KC. A toddler with curiosity and a cough. *Pediatr Emerg Care* 2010; 26: 232-234. – provided). As the medical director of The Poison Control Center at The Children’s Hospital of Philadelphia I have also seen numerous children injured by lamp oil-type products. But this is not a matter of science or epidemiology – it is one of common sense.

I am grateful that child-resistant closures are mandated by the CPSC for these products. Most of the warning labels that I have seen on these products have been so small as to be overlooked by parents; and, of course, are unreadable by two-year-old children. The use of these products around picnic areas and patios makes them particularly high-risk for exploratory children to mistake for food or drink. Not only should the CPSC require these products to be packaged in opaque containers, it seems reasonable that these products would be sold in packages typically associated with the sale and storage of other petroleum-based products such as gasoline.

Sincerely,

Kevin C. Osterhoudt, MD, MS; FAAP, FACMT, FAACT

Certified by the American Association of Poison Control Centers

at The Children’s Hospital of Philadelphia

34th Street & Civic Center Boulevard, Philadelphia, PA 19104-4399

Administration 215-590-2003 • Fax 215-590-4419 • Poison Help 1-800-222-1222 • <http://poisoncontrol@chop.edu>

THIS DOCUMENT HAS NOT BEEN REVIEWED
OR ACCEPTED BY THE COMMISSION.

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UNDER CPSA 6(b)(1)

PICK YOUR POISON

Section Editor: Kevin C. Osterhoudt, MD, MS

Contributing Authors: Pamela A. Mazzeo, MD, Madeline Renny, and Kevin C. Osterhoudt, MD, MS

A Toddler With Curiosity and a Cough

A 19-month-old boy with glucose-6-phosphate dehydrogenase deficiency is brought to the emergency department by emergency medical services after being found crying, choking, and coughing on the porch of his grandmother's house approximately 20 minutes earlier. He had been well that morning, but he was heard crying after having been left unattended for a few minutes, and he was found holding a small cup containing a liquid that had been left on the front porch after recently being used. His grandmother reports that he had some foaming around his mouth and liquid on his lips and that

he was spitting and gasping for air. His grandmother tried to wash out his mouth with water, but he refused to drink anything. The gasping continued for about 10 minutes after the ingestion. No vomiting occurred.

On arrival to the emergency department, the boy is in mild distress, and his coughing and crying persist. On physical examination, he is afebrile with a heart rate of 150 beats per minute, respiratory rate of 26 breaths per minute, blood pressure of 81/40 mm Hg, and blood hemoglobin oxygen saturation (measured by transcutaneous pulse oximetry) of 85% to 90% in room air. He is alert and interactive, but seems somewhat drowsy. His pupils are equal in size and are reactive to light bilaterally. His neck is supple. The oropharynx is clear, without erythema, edema, or exudate. Chest auscultation reveals no murmurs, and clear breath sounds

are heard bilaterally without wheezes, rales, or rhonchi. The abdomen is soft, nontender, and nondistended with normally active bowel sounds. His extremities are warm and well perfused. The boy's neurological examination demonstrates good cranial nerve, cerebellar, motor, and sensory function.

The boy is given blow-by oxygen, and his oxygen saturation improves to 98%. A venous blood gas measurement is as follows: pH 7.35; P_{CO_2} , 34 mm Hg; and HCO_3^- , 18.8 mmol/L. His coughing subsides after about 30 minutes. After 1 hour, his pulse oximetry measurement is 99% in room air. A chest radiograph reveals a right middle lobe infiltrate. The boy is transferred to a pediatric specialty hospital. Figure 1 displays his chest radiograph upon transfer.

Can you pick your poison?

Authors interested in submitting a case study in pediatric poisoning for the *Pediatric Emergency Care* feature *Pick Your Poison* are encouraged to contact Dr. Osterhoudt via E-mail at OsterhoudtK@email.chop.edu.

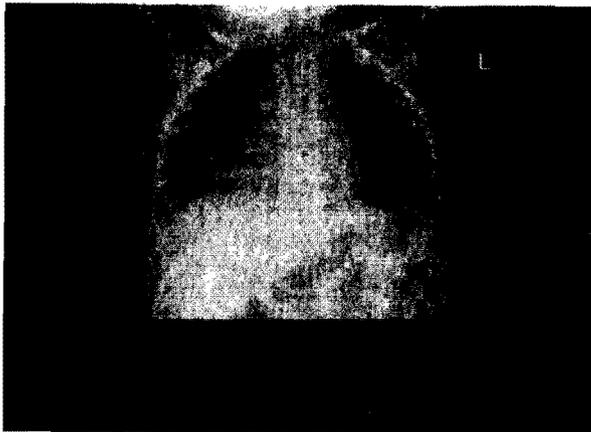


FIGURE 1. Chest radiograph demonstrating patchy basilar infiltrates.

This previously healthy toddler presented with drowsiness, hypoxemia, and radiographic evidence of pulmonary infiltrate after ingestion of a household product found at his grandmother's house. Several important epidemiological themes are apparent in this case. Nineteen-month-old children have great curiosity to pair with their newly mastered mobility and have a predilection to exploratory toxic exposures within the home. Indeed, children younger than 6 years account for 52% of poison exposures reported to the American Association of Poison Control Centers (AAPCC) in 2008.¹ These poison exposures occur with toxicants the children find in their environment, and perusal of the AAPCC data demonstrates that household products are commonly implicated in the poison exposures of young children. A basic tenet of public poisoning prevention education is to never store a household chemical in an unlabeled container—and certainly not in a container associated with food or drink,

TABLE 1. Common Hydrocarbon Products Found in the Home

Fuels	
Gasoline	
Kerosene	
Lamp oil	
Lighter fluid	
Torch fuel	
Cleaning agents	
Furniture polish	
Mineral seal oil	
Pine oil	
Solvents	
Stain removers	
Other	
Baby oil	
Cod liver oil	
Paint thinner	

such as a cup. It is also noteworthy that this exposure occurred at a grandparent's house—a recognized phenomenon that was reviewed in a previous "Pick Your Poison" article.² It is easy to see that this type of pediatric poisoning is not an "accident" but is the product of a combination of preventable events that, when brought together, lead to a reasonable probability of occurrence.

When a child becomes ill soon after a small, exploratory ingestion of a household product, 2 substances come to mind: (a) caustic acids and alkali and (b) hydrocarbons. With no mucosal burns noted on examination, and with prominent pulmonary signs and symptoms, this boy seems to have ingested a hydrocarbon product. His grandmother was able to identify the substance in question as lighter fluid.

Hydrocarbon ingestions by children are known to be an important source of pediatric morbidity and hospitalization worldwide, especially in developing countries where kerosene is widely used for cooking and heating. In the United States, almost 15,000 hydrocarbon exposures among children younger than 6 years of age were reported to the AAPCC in 2008.¹ Common household hydrocarbon products are listed in Table 1. Since 2008, poison

control centers have become concerned with reports of morbidity and mortality from hydrocarbon ingestions related to torch fuels³ (Fig. 2).

Hydrocarbons are organic compounds comprised primarily of carbon and hydrogen atoms and may be used as solvents for other substances with significant toxic potential including metals and pesticides (Table 2). Most household hydrocarbons, including kerosene, turpentine, lighter fluids, and lamp oils, are "aliphatic," meaning that they do not contain organic ring structures similar to benzene. "Aromatic" hydrocarbons, as well as halogenated hydrocarbons, have unique toxicities that are not reviewed in this discussion. The route of exposure (inhaled, orally ingested, or dermally absorbed), the volume ingested, the presence or absence of vomiting, and the physical properties of a particular aliphatic hydrocarbon determine the kind of toxicity it causes. For example, a substance may cause central nervous system toxicity due to absorption into the bloodstream after inhalation or ingestion; or it may cause serious pulmonary pathology after aspiration.

The potential of a hydrocarbon to travel into the lungs and cause pneumonitis depends on its volatility, viscosity, and surface tension.⁴ Highly viscous substances with low volatility, such as diesel fuel or mineral oil, are less likely to cause lung pathology unless aspirated directly or after vomiting. Substances with intermediate or low volatility and low viscosity, such as kerosene or lamp oils, pose the great risk of pulmonary toxicity because of the ease with which they can spread over mucosal surfaces and because of the direct toxicity they cause to lung tissue. Hydrocarbons cause pulmonary inflammation from chemical contact, leading to pneumonitis. Surfactant lipids are disrupted, and the cumulative pathophysiological effects of hydrocarbon pneumonitis seem to be decreased compliance and impaired gas exchange, resulting in ventilation-perfusion mismatch and difficulty ventilating and oxygenating affected patients.



FIGURE 2. An 8-year-old girl pouring a torch fuel that resembles apple juice.

TABLE 2. "CHAMP" Mnemonic for Hydrocarbons With Systemic Toxicity

C	Camphor
H	Halogenated hydrocarbons
A	Aromatic hydrocarbons
M	Metal-containing hydrocarbons
P	Pesticide-containing hydrocarbons

Central nervous system depression can follow hydrocarbon poisoning due to hypoxemia and also in a fashion similar to the effect of an inhaled anesthetic. A volatile hydrocarbon can diffuse easily throughout the body and into the central nervous system, where it can inhibit the transmission of neurons, which have a high lipid content and are thus particularly susceptible to lipid-soluble toxicants. Volatile hydrocarbons are also known to sensitize myocardial electrochemical pathways and may increase the risk for cardiac rhythm disorder in response to endogenous or exogenous catecholamines.

The clinical presentation of a hydrocarbon aspiration is usually characterized by an episode of choking, gagging, and coughing, usually within 30 minutes of the ingestion. Patients may experience respiratory distress, bronchospasm, or hemoptysis. Examination may reveal tachypnea, hypoxemia, cyanosis, or rhonchi. Fever is common in these patients and thought to be due to the release of systemic inflammatory mediators in the face of lung injury.

Chest radiography can reveal evidence of pneumonitis within as few as 30 minutes after ingestion, and the majority of, but not all, patients who develop radiographic opacities will have them within 4 hours of ingestion. Findings include infiltrates, pleural effusions, pneu-

matocoles, pneumothorax, pneumomediastinum, and pneumopericardium. A radiograph of another child with more severe pneumonitis is shown in Figure 3. Further studies may reveal leukocytosis, blood gas abnormalities reflecting respiratory compromise, and evidence of metabolic acidosis. If there is concern for other organ system involvement, as with ingestion of halogenated hydrocarbons, liver and renal function tests, an electrocardiogram, or other studies may be appropriate.

It is our practice to monitor asymptomatic children for 4 to 6 hours after presumed hydrocarbon ingestion and to obtain a chest radiograph at the end of that period of observation. Activated charcoal does not adsorb hydrocarbons well, and gastric lavage tubes render the gastroesophageal junction patent and may increase the risk of hydrocarbon spreading to the trachea. Asymptomatic children with no radiographic abnormalities may be discharged to home if family members are taught to closely observe for respiratory symptoms and if they have the ability to return to medical care. Symptomatic children, or those with radiographic opacities, merit continued medical monitoring of their clinical course as inflammatory injury may progress for up to 5 to 7 days.

Medical care of the child with hydrocarbon pneumonitis consists largely of supportive measures including administration of supplemental oxygen, provision of appropriate hydration and nutrition, and treatment of bronchospasm. Advanced methods of cardiorespiratory support including positive end-expiratory pressure, conventional mechanical ventilation, high-frequency oscillatory mechanical ventilation, surfactant replacement, and even extracorporeal membrane oxygenation

have all been used in severe cases of hydrocarbon lung injury.⁵⁻⁸ Corticosteroids have not been demonstrated to ameliorate lung injury in hydrocarbon pneumonitis and may increase risk of superinfection. Prophylactic antibiotics are typically not recommended after hydrocarbon ingestion; however, hydrocarbon pneumonitis can lead to fever, leukocytosis, radiographic lung opacities, and auscultatory crackles such that detection of secondary bacterial pneumonia can be difficult.

As with most childhood poisonings, prevention is the key to reducing rates of injury and death from hydrocarbon ingestion. A 2008 study performed by the World Health Organization Regional Office for the Eastern Mediterranean identified 256 children with hydrocarbon ingestions who presented to a poison control center in Cairo, Egypt, between February and November 2004.⁹ Of those cases, the container from which the children ingested the toxic substance was most commonly a water bottle (61%) or a soft-drink bottle (20%), and these bottles were usually stored on the ground (76%) or less than 1.5 m above ground (19%). It cannot be overemphasized that the boy in this case encountered the toxic chemical improperly stored in a cup that was found on the ground in an area in which he was playing unsupervised. This case underscores the importance of providing appropriate anticipatory guidance to the families of toddlers about the proper storage of household chemical products.

During the boy's hospital stay, he developed transient tachypnea and expiratory wheezing, which resolved with albuterol treatments. On the second hospital day, he spiked fevers to 39.5°C, which were treated only with acetaminophen. Over the next 2 days, his fever subsided, and his respiratory examination findings normalized; he has remained well since.

Final diagnosis: *Hydrocarbon pneumonitis.*

Pamela A. Mazzeo, MD

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Madeline Renny

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Philadelphia, PA

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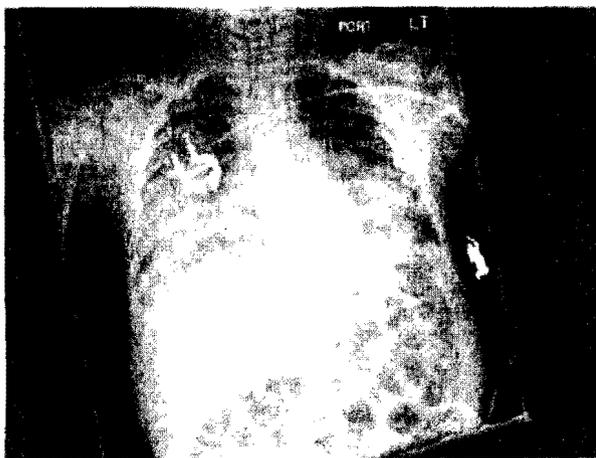


FIGURE 3. A chest radiograph of severe hydrocarbon pneumonitis from ingestion of lamp oil.

Key Words: hydrocarbon, poisoning, pneumonitis

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9. Bond GR, Picche S, Somcki Z, et al. A clinical decision rule for triage of children under 5 years of age with hydrocarbon (kerosene) aspiration in developing countries. *Clin Toxicol.* 2008;46: 222-229.

ERRATA

The Nature and Characteristics of Abdominal Injuries Sustained During Children's Sports: Erratum

In this article, the order of authors has been printed incorrectly. It should have appeared as

Farah Noaman, Lawrence T. Lam, PhD, S.V. Soundappan, and Gary J. Browne, MD, MBBS, MSpMed

Reference

1. Browne GJ, Noaman F, Lam LT, et al. The nature and characteristics of abdominal injuries sustained during children's sports. *Pediatr Emer Care.* 2010;26(1):30-35.

Pediatric Ingestions of Hand Sanitizers: Debunking the Myth: Erratum

In this article, incorrect numbers were presented on rows 4 and 5 of Table 2. The correct numbers appear below.

TABLE 2. Outcome

Outcome	No. Patients
No effect	31 (4.8%)
Minor effect	26 (4%)
Moderate effect	0
Nontoxic—expect no effect	372 (57.5%)
Minimal clinical effects possible	208 (32.1%)
Unable to follow—potentially toxic	0
Unrelated	10 (1.6%)
Fatality	0

Reference

1. Mrvos R, Krenzelok EP. Pediatric ingestions of hand sanitizers: debunking the myth. *Pediatr Emer Care.* 2009;25(10): 665-666.

PUBLIC SUBMISSION

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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0233

Comment from nancy blanchat

Submitter Information

Name: nancy blanchat

General Comment

being a grandmother of 4 - i was appalled to see the photo of the fuel bottle next to the apple juice containers. apple juice is our beverage of choice. to think that the bottles could be so easily mistaken makes me sick with worry.

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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0234

Comment from Miss April

Submitter Information

Name: Miss April

General Comment

torch fuel and lamp oil would have distinctive scent quite different from anything edible. the label should indicate clearly what it is and how it should be stored.

Anonymous Commenter

PUBLIC SUBMISSION

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Category: State or Local Government
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0235

Comment from kim cagle

Submitter Information

Name: kim cagle

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1325 salsbury st

norman, OK, 73069

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Phone: 4059736177

Fax: 4058012086

Government Agency Type: State

General Comment

I fill this is very necessary to save children's lives!

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 24, 2011
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Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0236

Comment from Nancy Beshears

Submitter Information

Name: Nancy Beshears

General Comment

As a pediatric nurse I have seen too many children injured or killed by drinking torch fuel and lamp oil! There has to be a way to package it in such a way that children CANNOT get in to it. At the very least it must not look like something yummy to drink! Please don't let any more families have to go through the pain and heartache of losing a child to torch fuel and lamp oil.

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Received: September 24, 2011
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Tracking No. 80f2a09d
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Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0237

Comment from Katherine Nelson

Submitter Information

Name: Katherine Nelson

General Comment

Change the package so it doesn't look like juice, before another child dies!!!!!!

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 25, 2011 Status: Posted Posted: September 26, 2011 Tracking No. 80f2af60 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0238

Comment from Amber Green

Submitter Information

Name: Amber Green

Address:

3859 CR 1014

Farmersville, TX, 75442

Email: amber73100@yahoo.com

General Comment

My Name is Amber Green and I am the niece Desi Green. Desi is the Grandmother of the sweet little boy who died from drinking the torch fuel that he thought was juice. I am here to tell you and beg you please dont loet this keep happening to kids and adults. This is not the way to sell your product to make it look like a kids juice. There are better ways for you to sell torch fuel. So many kids have lost thier lives due to the neglagence of these companys that make torch furl look like juice. Its a truly sad day when an innocent child dies because of such terrible judgement on a company's part. It sickens me to think of another child having to go through what this sweet baby boy did. Think of the children and the lives you could and can be saving by just making a simple change to a very dangerous product. Jhonethyn A. A. Bumpas was taken from this earth way to early and had so much more life to live but it was cut short because of what he thought was juice. Its just not right that he had to leave this earth at such a very very young age. Its just tragic and hearbreaking to think about it. I am begging you please change the way torch fuel looks cause if you dont many more innocent lives are put at stake. Thank you for your time.

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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0239

Comment from Bettsy Bumpas

Submitter Information

Name: Bettsy Bumpas

Address:

area a lot 9 humphrey lake
marlow, OK, 73533

Email: bettswana@yahoo.com

Phone: 5806068694

General Comment

As the petitioner, it should be very clear why I feel this product is in dire need of change. Myself and my family live with the heartache and consequences of defective product planning daily. We are taught as children to learn from our consequences, which is why we should allow our hindsight to become our foresight. We know the packaging is faulty now. Countless dead children have taught us this. I implore you to please allow us this change.

As of: November 21, 2011 Received: September 25, 2011 Status: Posted Posted: September 26, 2011 Category: Consumer/Individual Tracking No. 80f2b784 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0240

Comment from sharon miller

Submitter Information

Name: sharon miller

Address:

1906 country club rd.
duncan, OK, 73533

Email: sharonkmiller@mac.com

Phone: 580-255-9328

Fax: 580-255-2117

General Comment

I lost my nephew because the torch oil looked and was packaged to look like apple juice. I am begging for the change in packaging so another child is not lost due to this error. Please safe the lives of all the children who will possibly make the same mistaken identity of lamp oil for apple juice. I pray that another child is not lost. I have seen the horror of what this product can due to a child that has ingested this product. I have seen the pain of a family for the loss of their child.

As of: November 21, 2011 Received: September 26, 2011 Status: Posted Posted: September 26, 2011 Tracking No. 80f2ca83 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0241
Comment from Tye Smith

Submitter Information

Name: Tye Smith

General Comment

The containers should not be see through. It is an unnecessarily attractive hazard to kids.

As of: November 21, 2011
Received: September 26, 2011
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Posted: September 27, 2011
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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0242

Comment from Simone Fulmer

Submitter Information

Name: Simone Fulmer

Address:

1215 Classen Drive

Oklahoma City, OK, 73120

Email: sfulmer@whittenburrage.com

General Comment

It is my understanding that it would only cost \$.02 more per bottle for a black bottle. Surely the life of a child is worth more than that \$.02.

PUBLIC SUBMISSION

As of: November 21, 2011
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Posted: September 27, 2011
Tracking No. 80f2eb0e
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0243

Comment from Reggie Whitten

Submitter Information

Name: Reggie Whitten

Address:

1215 Classen Drive
Oklahoma City, OK,

General Comment

Please make products safer for our children. With an easy fix, we can make sure our children are protected from dangerous chemicals.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 26, 2011
Status: Posted
Posted: September 27, 2011
Tracking No. 80f2eb40
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0244

Comment from Karen Baker

Submitter Information

Name: Karen Baker

General Comment

The packaging on the torch fuel and lamp oil needs to be changed to a non-see-through package so that people do not think it is something to drink. I was at Walmart this weekend and saw some bottles on clearance and I thought it was apple juice. It was not. It was the torch fuel and lamp oil. It is so easy to mistake it for apple juice if one can not or does not read it. Please change it before another person dies from this.

As of: November 21, 2011
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Posted: September 27, 2011
Tracking No. 80f2eb95
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0245

Comment from Mark Miller

Submitter Information

Name: Mark Miller

Address:

812 S. Indianapolis

Tulsa, OK, 74112

General Comment

This seems a little absurd that we're even having to comment on something so potentially dangerous and easily and virtually cost free to remedy!

And we wonder why citizens have no faith in our government...

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 26, 2011
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Posted: September 27, 2011
Tracking No. 80f2eea1
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0246

Comment from Thomas Ganem

Submitter Information

Name: Thomas Ganem

General Comment

This change needs to be made. Children see something that looks inviting and they will go for it. If they can't see it, they won't try. Save a child. Go to non-see through packaging.

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Received: September 26, 2011
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Posted: September 27, 2011
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Tracking No. 80f2eea9
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0247

Comment from Jenelle Murfin

Submitter Information

Name: Jenelle Murfin

Address:

711 west elder

duncan, oklahoma, United Kingdom, 73533

Email: jenmuffin84@gmail.com

Phone: 3093134511

General Comment

It makes me angry to know that this world has come to this. Having to sign your name to a petition in order for someone to hear a parents cry for there loved ones in order to make this world a safer place. It breaks my heart to know that someone could be going through this right now and it all could be stopped in a moment if people who are responsible could just own up to their mistakes and deal with the problem, like an adult. I'll follow Betsy through this whole thing whenever she needs me I'm there.

PUBLIC SUBMISSION

As of: November 21, 2011 Received: September 26, 2011 Status: Posted Posted: September 27, 2011 Category: Other Tracking No. 80f2ef08 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0248

Comment from John Branum

Submitter Information

Name: John Branum

Address:

14525 SW Millikan Way #10040

Beaverton, OR, 97005

Email: johnbranum@me.com

Phone: 4052494215

Fax: 18004188210

General Comment

On 9/26/11 at about 12:30 P.M. CST, I was advised by Assistant General Counsel for the CPSC, that the staff for the CPSC have recommended to the Commissioners that the public comment period be extended for an additional 30 days. I appreciate the CPSC for the extension to the public comment period. This will permit time to provide the CPSC with information that rebuts information previously provided by Lamplight Farms. This will also provide time for Petitioner to provide other important material to the CPSC which I believe the CPSC will find to be very important.

I obviously support changing the law.

Companies must never cause needless danger to children.

Manufacturing dangerous chemicals, (that otherwise resemble the color of juice) in clear plastic

THIS DOCUMENT HAS NOT BEEN REVIEWED

CLEARED FOR PUBLIC RELEASE

OR ACCEPTED BY THE COMMISSION.

UNDER CPSA 6(b)(1)

bottles, causes needless danger to children.

One of the manufacturers of torch fuel has testified it costs only about two cents more per bottle to place torch fuel in a solid black bottle rather than a clear bottle.

While this Petition has been in a pending status, other children have been injured and killed. Several of these children were injured or killed due to ingestion of torch fuel manufactured by Lamplight Farms.

Additional information about these additional occurrences will be provided in writing over the next 30 days, as permitted by CPSC extension.

As of: November 21, 2011
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Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0249

Comment from Kim Buchanan

Submitter Information

Name: Kim Buchanan

General Comment

Please put unsafe chemicals in non see through containers.

As of: November 21, 2011 Received: September 26, 2011 Status: Posted Posted: September 27, 2011 Category: Consumer/Individual Tracking No. 80f30021 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0250

Comment from Eric Bumpas

Submitter Information

Name: Eric Bumpas

Address:

1016 North B

Duncan, OK, 73533

Email: ericbumpas@yahoo.com

General Comment

In a time of advanced technology and great strives in inviromentle protection agencies that our great goverment provides to its citizen . It is beyond comprehension that a good American company that has the know how to retool it manufacturing process or simply change the color of lantern oil that resembles a refreshment that all of us has enjoyed apple juice,can stand behind that very process. This a horreble thing to ask of anyone but try an imagine if it was your little bundle of joy reaching for that bottle thinking it was a refreshing drink of apple juice but instead it was the last thing he would ever drink tiki fluid.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 26, 2011
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Posted: September 27, 2011
Tracking No. 80f3005f
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0251

Comment from Wayne Allison

Submitter Information

Name: Wayne Allison

Address:

OK,

Organization: Allison Legal, LLC

General Comment

Cost is an unreasonable reason for failing to require the proposed packaging. The clear benefit of the proposed rule outweighs any and all arguments from the producers special interest. Responsible government demands promulgation of the rule.

As of: November 21, 2011
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Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0252

Comment from William McMahon

Submitter Information

Name: William McMahon

General Comment

Change it. No point in risking accidental consumption.

As of: November 21, 2011
Received: September 26, 2011
Status: Posted
Posted: September 27, 2011
Tracking No. 80f30103
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0253

Comment from David Bernstein

Submitter Information

Name: David Bernstein

General Comment

Young children are dying and becoming seriously hurt when they see torch fuel and think it is apple juice. The companies that make it can put it in a non-see through bottle for 2 cents more per bottle -- and save kid's lives. There are about 1500 ingestions of torch fuel/lamp oil annually in the US.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 26, 2011
Status: Posted
Posted: September 27, 2011
Category: Consumer/Individual
Tracking No. 80f30108
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0254

Comment from cherokee bumpas

Submitter Information

Name: cherokee bumpas

Address:

1016 north b
duncan, OK, 73533

Email: churkylurky21@gmail.com

Phone: 5807361094

General Comment

The changes that need to be made to this product are obvious. The container of this fluid should not be clear, the color should not be similar to apple juice, and the smell should be bitter not sweet. The so called child proof lid is not child proof or my nephew would be here today and I would not be writing this comment now. The simple carelessness while making this product resulted in the death of my nephew Jhonethyn and has caused my family to be torn apart. How many children and elderly have to die and how many families must endure this tragedy before a change is made? At some point you must realize these are people, loved ones, not dollar signs. A few simple changes of this product can save lives.

PUBLIC SUBMISSION

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Posted: September 27, 2011
Tracking No. 80f30147
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0255

Comment from C. Combs

Submitter Information

Name: C. Combs

Address:

1150 34th St

10 D

Missoula, MT, 59801

General Comment

I believe that it is our duty as adults to protect children in any way that we can. A small change can save a life. Just an itty bitty thing such as a toxic label warning. Child proof caps, etc etc. I can go on all night, but the fact of the matter is that children are dying out here. It is time something is done to prevent the next deaths.

As of: November 21, 2011
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Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0256

Comment from Jeremy Thurman

Submitter Information

Name: Jeremy Thurman

Address:

7315 SW 112

Oklahoma city, 73173

Email: Jeremy@McIntyreLae.com

Phone: 405-917-5250

General Comment

This is needed. A cheap fix which laces our children above profits.

As of: November 21, 2011
Received: September 26, 2011
Status: Posted
Posted: September 27, 2011
Tracking No. 80f3022e
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0257

Comment from kevin hill

Submitter Information

Name: kevin hill

General Comment

i want to see colored bottles for torch fuel

As of: November 21, 2011 Received: September 26, 2011 Status: Posted Posted: September 27, 2011 Category: Consumer/Individual Tracking No. 80f302ef Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0258

Comment from Eadyn Baker

Submitter Information

Name: Eadyn Baker

Address:

area a lot 9 Humphrey Lake
marlow, OK, 73534

General Comment

Jhonethyn was my baby brother, and i was a witness to how it all felt to have a special person in my family pass away. I had to sit there and watch, as my family fell apart peice by peice and fade away. I know how it feels to lose a loved one and i know how it feels to lose a loved one. If it was two years ago or just yesterday you have to live with the fact a company didn't even care. It makes me feel dissapointed that we have to live in this terrible careless world and have to know that there are people dying and being vry injured and almost dying and the company won't even change their packaging and that is really all that needs to be changed. I can't even bare to think about how many have died and been severly injured and could have attempted to change what we are attempting today.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: September 26, 2011
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Posted: September 27, 2011
Tracking No. 80f302f0
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0259
Comment from Jeff Hargrave

Submitter Information

Name: Jeff Hargrave

General Comment

Such a small price to save many lives. Please make these containers non-transparent. It only makes sense.

PUBLIC SUBMISSION

As of: November 21, 2011
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Status: Posted
Posted: September 27, 2011
Tracking No. 80f3036e
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0260

Comment from Trey Kouri

Submitter Information

Name: Trey Kouri

Address:

114 E. Sheridan Ave.

Suite102

Oklahoma City, 73104

Email: Tkouri3999@yahoo.com

Phone: 405-840-4357

Fax: 405-235-3425

General Comment

I have read the proposed rule change and am very much in favor. Frankly, I can't conceive the thought that anyone would be opposed to such a change. The cost is minuscule and the benefit to society in general is immeasurable. I certainly hope that those who hear this use common sense and not political pressure when addressing this proposal. I find it hard to believe that anyone, including the manufacturers could have a logical reason to oppose this.

Please do not let this fall on deaf ears.

Thank you.

As of: November 21, 2011 Received: October 19, 2011 Status: Posted Posted: October 23, 2011 Category: Consumer/Individual Tracking No. 80f55fa3 Comments Due: November 16, 2011 Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0262

Comment from Desi Green

Submitter Information

Name: Desi Green

Address:

RR 2 Box 318

Duncan, OK, 73533

Email: jhonethyngrammy@localnet.com

Phone: 5802526004

Redacted Comment

Same person who submitted comment CPSC-0048-0030

,Desi Green People I just read the comment from Lamplight company, Tikki Torch fuel maker, It appears they are well aware of the dangers of there product, they even now the solution, to sell there product in a non see threw container, but instead of taking steps to make there product safer, they want the CPSC to tell them they have to, and then give them a year to do it ! What I or anyone else who has ever lost a loved one would do for one more year? But they want one more year to do what they already admitted would save lives! That would be one more year of death from the product, can any one go threw one more year to do what should have been done years ago,? Are any of us really that stupid???????

As of: November 21, 2011
Received: October 19, 2011
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Posted: October 23, 2011
Category: Consumer/Individual
Tracking No. 80f560aa
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0263
Comment from Chris Bumpas

Submitter Information

Name: Chris Bumpas
Address:
rr 2 box 318
Duncan, OK, 73533
Email: Bumpas.chris@yahoo.com
Phone: 5806061004

General Comment

Greg Chris Bumpas
It would appear that greed takes the place of morals. If it would have fixed the first time someone was hurt and died from this poison my son would still be here along with many others that had familys that love and miss them. Instead of doing what they already know has to be

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done they put it of one more year. That's one more camping and summer season people , children, sons and daughters are going to die. If you don't think this concerns you imagine you at your childrens funeral next summer. Imagine you going to a graveyard to tell your son happy birthday. Nowe do they deserve another year. I would love another year with my baby boy but instead I go to a grave and talk to a head stone

As of: November 21, 2011
Received: October 19, 2011
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Posted: October 24, 2011
Tracking No. 80f560ae
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0264

Comment from barbara jones

Submitter Information

Name: barbara jones

Address:

913 w hackberry
duncan, 73533

Email: izahottie@yahoo.com

Phone: 5806565889

Redacted Comment

Comments from same person in CPSC-2011-0048-0166

If it takes just a few more cents to change the look of a bottle, but saves a life ill pay the extra tax dolars open your eyes this could be one of yours.....

PUBLIC SUBMISSION

As of: November 21, 2011
Received: October 19, 2011
Status: Posted
Posted: October 24, 2011
Tracking No. 80f5621f
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0265

Comment from Vicki Davis

Submitter Information

Name: Vicki Davis

Redacted Comment

Same submitter from CPSC-2011-0048-0058

The fact that the tiki torch fluid is packaged to resemble apple juice is absurd!!!!

I know of a family that lost their child on his 2nd birthday due to drinking the fluid believing that it was his favorite drink, apple juice. THIS PACKAGING NEEDS TO BE CHANGED NOW!

I cannot believe that trying to get this changed is even an issue!!! I would think, if it would spare one more family from having to endure this kind of loss, the packaging would have been changed immediately.

I pray that this is changed so that no other family has to endure the pain that this family endured. It is outrageous that it has not already been done. It is only common sense and human compassion that should have already resolved this issue.

As of: November 21, 2011
Received: October 19, 2011
Status: Posted
Posted: October 24, 2011
Tracking No. 80f56462
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0266

Comment from Dovie Punneo

Submitter Information

Name: Dovie Punneo

Address:

3960 Country Estates
Duncan, OK, 73533

Email: dlpunneo@gmail.com

Phone: 5804674955

Fax: 5802525604

General Comment

This must be passed immediately. They manufacturers my not have a heart knowing about the deaths and not taking action on their own. You are caretakers of the public. It should be passed and made effective immediately!! Please do not wait for even one more death...

As of: November 21, 2011
Received: October 20, 2011
Status: Posted
Posted: October 24, 2011
Tracking No. 80f57111
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0267

Comment from teresa williamns

Submitter Information

Name: teresa williamns

Address:

301 north b

duncan, oklahoma, 73533

Email: teresa.williams@cameron.edu

Phone: 580-606-7418

General Comment

you need to change this immediately, children and adults are ingesting this and dying. Please dont wait a year and let another child or adult die due to the bottle that you have admitted there is fault in it. My friend lost her two year old grandson on his birthday due to this and i watch each day as the father, mother. grandmother and the whole family and friends are dying a little each day. Please dont put another family thru this. Lives are more important than you waiting a year to change everything

PUBLIC SUBMISSION

As of: November 21, 2011
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Posted: October 27, 2011
Tracking No. 80f5d530
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0268
Comment from Cameron Cherry

Submitter Information

Name: Cameron Cherry
Address:
PO Box2807
Edmond, OK, 73083
Email: cameroncherry@hotmail.com
Phone: 405.478.8379
Submitter's Representative: self
Organization: The Cherry Law Firm

General Comment

I support this regulation to force non see through requirements on manufacturers so that children will be better protected.

As of: November 21, 2011
Received: October 27, 2011
Status: Posted
Posted: October 30, 2011
Tracking No. 80f5dec4
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0269

Comment from Lisa Smith

Submitter Information

Name: Lisa Smith

Address:

P.O. Box 2138

Humphrey lake Area A Lot 9 Marlow OK 73055

Duncan, 73534

Email: smithpoms@yahoo.com

Phone: 580-658-1040

General Comment

They need to change the packaging on the lamp oil and torch fuel. We go and buy charcoal starter for our grills and propane, and even paint thinner, all these are sold in non see through containers and they are all flammable.....WHAT IS THE DIFFERENCE???

As of: November 21, 2011 Received: November 01, 2011 Status: Posted Posted: November 06, 2011 Category: Manufacturer Tracking No. 80f63f69 Comments Due: November 16, 2011 Submission Type: Web
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PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0270

Comment from Carol Howard

Submitter Information

Name: Carol Howard

Address:

1814 W Main St

1814 w.main str.

Duncan, OK, 73533

Email: lynnehoward7559@yahoo.com

Phone: 5804752011

Redacted Comment

Same person who submitted comment CPSC-2011-0048-0167.

Why does it take a year? Why is it so hard that lives have already been took, hearts broke over loosing their loved ones. Jhonothan Bumpas was the grandchild of one of my oldest friends, i watched his dad grow up, I now watch the pain they suffer from missing him. I listen to the words they write to him, The what if guilt that they shouldnt be caring for it wasnt their fault it was the bottling companies. Did you look at that childs body when they pronounced him dead? Look at the picture its in the form no parent should have to see their child that way.. No parent should have to bury their child... Change the bottle before you cause another life to be lost.. DONT WAIT..

As of: November 21, 2011
Received: October 30, 2011
Status: Posted
Posted: November 06, 2011
Category: Consumer/Individual
Tracking No. 80f619d8
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0271

Comment from Beverly Jeffries

Submitter Information

Name: Beverly Jeffries

Address: United States,

General Comment

I agree that if you place liquids into containers that is attractive to children they are going to attempt to drink it. The fact that you use childproof locking caps is a plus but not always the answer. It will be helpful to ensure that the containers are properly marked with poisonous signs and that parents educate their children on these signs and what it means to them if they drink the contents. Also, putting the flammable liquids into a container that is unattractive is another step to try to distract the child from wanting to drink the contents. As with all of these types of material parents need to keep these out of reach of children or keep childproof locks on all cabinets where hazardous materials are stored. Many consumers store things in containers that is not what is properly described on the label. There should be strict punishment to parents that cause harm to their children by using containers for hazardous material.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: November 11, 2011
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Posted: November 14, 2011
Tracking No. 80f6ae61
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0272

Comment from karen jennings

Submitter Information

Name: karen jennings

Address:

1008 w pecan
duncan, OK, 73533

Email: karendjennings@yahoo.com

Phone: 5804670908

Redacted Comment

Same person from Comment CPSC-2011-0048-0033

We all have in common the love of a child! I know i love my grandson!! Please make sure that torch fuel and lamp oil are sold in non see through packaging!! THANK YOU!!!

PUBLIC SUBMISSION

As of: November 21, 2011 Received: November 12, 2011 Status: Posted Posted: November 14, 2011 Category: Consumer/Individual Tracking No. 80f6b07c Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0273

Comment from Kirby Green

Submitter Information

Name: Kirby Green

Address:

rr 2 box 318

Duncan, OK, 73533

Email: jhonetyngrammy@localnet.com

Phone: 5802526004

General Comment

I am married to Jhonetyn Bumpas, Grandmother, the pain caused to this family is beyond belief, When my wife read the comment from the manufactor of Tikki Torch fuel, they almost had to put her in the hospital, this bottle they need 1 year to change? Do they know what it felt like to hear one more death caused by a child drinking poison does to someone who lost a child the same way? Why should inventory and buisness manufacturing schedules be put before a single life? This bottle is unsafe, PERIOD, Changeing this see threw bottle should have been done years ago, NOT IN ONE MORE YEAR, Kirby Green

PUBLIC SUBMISSION

As of: November 21, 2011
Received: November 13, 2011
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Posted: November 14, 2011
Tracking No. 80f6b94c
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0274

Comment from Debra Tackett

Submitter Information

Name: Debra Tackett

Address:

7666 162nd rd
Winfield, KS, 67156

Email: tackett@lluvspeed.net

Phone: 620-221-6513

General Comment

I never got to meet my great nephew Jonathan Bumpas, he died before we met. A senseless death that could have been prevented. Please change your packaging to protect the children and the handicapped that may not know better regardless of their age. This is all we are asking. I use to use the torch fuel when camping but I know do not. I would if it was safer. Please what if this was your child and you had to go through what my neice and family have had to go through. Thank you

PUBLIC SUBMISSION

As of: November 21, 2011 Received: November 14, 2011 Status: Posted Posted: November 14, 2011 Tracking No. 80f6b7d9 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0275

Comment from Donna Ehrlich

Submitter Information

Name: Donna Ehrlich

General Comment

This is a tragedy that could happen to ANY family.....including YOURS. Innocent children should not have to die to get you to do what is right. There is no difference in this product than Gasoline or other fuels...all we ask is for safer packaging....is that too much?? Would it be too much if that was your child??

PUBLIC SUBMISSION

As of: November 21, 2011 Received: November 15, 2011 Status: Posted Posted: November 18, 2011 Category: Consumer/Individual Tracking No. 80f6cf41 Comments Due: November 16, 2011 Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0276

Comment from Lillian Hesbrook

Submitter Information

Name: Lillian Hesbrook

Address:

5355 West Beech Ave
 Duncan, OK, 73533

Email: maree_404@hotmail.com

Phone: 580-656-3733

General Comment

Please push for non see thru containers. We do not need anymore children dying. My friend, Desiree Green, lost her grandson because he drank tiki torch fuel thinking it was koolaid. Thank you. Lillian Hesbrook.

PUBLIC SUBMISSION

As of: November 21, 2011
Received: November 15, 2011
Status: Posted
Posted: November 18, 2011
Category: Consumer/Individual
Tracking No. 80f6d023
Comments Due: November 16, 2011
Submission Type: Web

Docket: CPSC-2011-0048

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001

Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0277

Comment from Christy Green

Submitter Information

Name: Christy Green

Address:

3506 Kacey

Duncan, OK, 73533

General Comment

As a concerned grandmother, I would respectfully request that the torch fuel and lamp oil packaging be changed to prevent further injury or loss of life.

As of: November 21, 2011
Received: November 15, 2011
Status: Posted
Posted: November 18, 2011
Category: Consumer/Individual
Tracking No. 80f6d35b
Comments Due: November 16, 2011
Submission Type: Web

PUBLIC SUBMISSION

Docket: CPSC-2011-0048
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Comment On: CPSC-2011-0048-0001
Petition Requesting Non-See-Through Packaging for Torch Fuel and Lamp Oil

Document: CPSC-2011-0048-0278
Comment from Jamie Moore

Submitter Information

Name: Jamie Moore
Address:
Rt 2 box 320
Duncan, OK, 73533
Email: jamie.moore92@yahoo.com

General Comment

Please change to the non see thru containers, You cant put a dollar amount on a childs life...Please consider this change. Save a childs life, Spair a family members life with pain..

Thank you