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## LOG OF MEETING

DIRECTORATE FOR ENGINEERING SCIENCES CPSC/OFC OF THE SECRETARY OF INFORMATION

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**SUBJECT:** Meeting with The Society of the Plastics Industry (SPI) to Provide an Update on the CPSC Plastics Flammability Work

**DATE(S) OF MEETING:** August 13, 1998

**PLACE:** SPI Offices, Washington, D.C.

**LOG ENTRY SOURCE:** Hammad Ahmad Malik

**DATE OF ENTRY:** August 18, 1998

**COMMISSION ATTENDEES:** William H. King, ESEE  
Hammad Malik, ESEE

### NON COMMISSION ATTENDEES:

Pat Toner, SPI  
Ted Abbot, Neste Resins  
Sheila A. Miller, Keller and Heckman LLP  
Donald Goodman, Oxycam  
John O'Laughlin, Keller and Heckman LLP  
Robert S. Strength, Product Safety Management, Inc.  
Steven R. Carow, Plaslok Corporation  
Dan Benedict, SPI/Spray Polyurethane Foam Div.  
Marcelo Hirschler, GBH International  
H.J. Hall, Vinyl Institute  
Paul B. Brown, GE Plastics  
Robert W. Bailey, Bailey Consulting, Inc.  
Doug Wetzig, Geon/Synergistics  
Rick Mulhaupt, National Fire Protection Research Foundation  
Kurt Reimann, BASE Corporation  
Russ Legion, Dow  
A. William Cooker, AW Cooker and Associates, Inc.  
Rachel Berrier, ICI Polyurethanes  
Brad Gougeon, Dow Chemical  
Franwalker Lichtenberg, SPI  
Fred Sonnenberg, Styro Chem International  
Carl Tripp, Polyolefins Council  
Gordon Gillerman, U.L., Washington, D.C.  
Jerry Kirshenbaum, Ticona  
Goerge Fechtmann, U.L., Melville, N.Y.



Edward V. Hickey III, Thompson, Hine, and Flory LLP  
Peter G. Sparber, National Association of State Fire  
Marshals  
Michael A. Brown, Brown and Freeston, P.C.

**SUMMARY OF MEETING:** Mr. King provided a brief history of the CPSC involvement in the flammability of plastic enclosures. Mr. King mentioned that in 1994 the CPSC staff became concerned with the misapplication of polymeric materials. Prior to this time the CPSC staff addressed plastic flammability on a product by product basis. The CPSC staff began to look for a commonality between cases that may be addressed to help reduce the number of electrical appliance related fires. The CPSC staff was not sure of how to address these concerns at the time; so UL was approached.

Mr. King then spoke about the formation of the UL Plastics Flammability Ad-Hoc Committee. This committee was formed to address the CPSC staff concerns among others. The CPSC staff was invited to participate in the committee and has served as an integral part.

Mr. King described the proposal for revision of UL 746C made by CPSC staff in 1996. He mentioned how the proposal was to essentially eliminate the distinction the standard makes between insulated and uninsulated internal live parts in the determination of the level of flame resistance of the appliance enclosure. This proposal was tabled by UL in favor of further study.

Mr. King gave an overview of the plastics flammability project undertaken to refine the CPSC staff proposal. He indicated the following three major items that need to be addressed as a result of the testing:

1. Remove the distinction between insulated and uninsulated internal electrical components in relation to enclosure flammability requirements.
2. To provide a clear and precise definition for attended and unattended use appliances.
3. Be more specific as to the flame application points for the UL 746C end-product flame tests.

Mr. King stated that at the June meeting of the Ad-Hoc Committee UL indicated that they are currently considering several modifications to UL 746C to address the CPSC staff items. He also mentioned that at this meeting UL stated that they are considering other modifications to incorporate some requirements from the international (IEC) standards into UL 746C.

Mr. King mentioned that the proposals that UL is planning to make for modifications to UL 746C are adopted, a strong expectation for a significant reduction in household appliance fires exists. Mr. King indicated that the CPSC staff concerns and the subsequent UL proposals are supported by actual data. He also stated that it is unreasonable to expect a total elimination of all appliance fires; however, the goal of minimizing the possibility of structural fires caused by electrical appliance failures is realistic and attainable. Mr. King stressed the need for addressing flammability issues relating to plastic materials considering the ever increasing use of polymeric materials.

Mr. George Fechtmann of UL gave a presentation on the proposals that UL will be making to change UL 746C.

Mr. Fechtmann introduced himself as the chairman of the UL Industry Advisory Council and Industry Advisory Group for plastics. Mr. Fechtmann gave a brief synopsis of the relevant UL standards that address the properties of polymeric materials used in appliances, i.e. UL 94 and UL 746 A, B, C, D, E, and F. He also provided a brief history of the development of UL 746 and the philosophy encompassed within the requirements found in the standard.

Mr. Fechtmann then gave an overview of the UL standards-making process and specifically the CPSC staff's involvement in plastics flammability requirements.

Mr. Fechtmann described the proposals that UL was considering that were first presented during the June Ad-Hoc Committee Meeting. He explained that a new standard UL 60335 has been proposed, which is essentially a copy of IEC 60335. Mr. Fechtmann also described the glow-wire ignition test and the ball pressure tests that will be part of the upcoming proposals. He mentioned that UL is undertaking a project to compare the flammability ratings and hot-wire ignition test data with data obtained from the glow-wire ignition test to establish a correlation with existing methods of flammability/ignitability measurement.

Mr. Fechtmann then answered a number of questions to clarify what is included in the upcoming proposals and what is included in UL 60335.1.