

LOG OF MEETING

SUBJECT: Spontaneous Combustion of Oily Rags

DATE: July 7, 1994

PLACE: CPSC, Bethesda, MD

NON-COMMISSION ATTENDEES:

David Lloyd, National Paint and Coatings Association  
Stephen Sides, National Paint and Coatings Association

COMMISSION ATTENDEES:

James F. Hoebel, ESME  
George W. Rutherford, EPHF  
Robert Franklin, EC  
Mary Toro, CE  
Leonard Schachter, EPHA  
Harleigh Ewell, OGC  
A. G. Ulsamer, HS

LOG ENTRY SOURCE: James F. Hoebel



SUMMARY:

Spontaneous combustion of oily rags was highlighted during the testimony of Gloria Schaffer of Connecticut at the CPSC FY 1996 Priorities Public Hearing, May 12, 1994. Connecticut has since passed legislation requiring labeling of drying oil products (primarily furniture polishes containing linseed or tung oil). The labeling specifies the hazard and describes recommended disposal of oily rags.

The National Paint and Coatings Association (NPCA) recognizes the hazard, and has established recommended labeling in their voluntary labeling guide. The Connecticut law is similar to the NPCA guide.

CPSC is evaluating appropriate options to address this hazard, which could include mandatory labeling under the FHSA, encouragement of voluntary industry labeling, or consumer awareness efforts.

Many NPCA members sell products in Connecticut covered by the new Act. They are advising their members of their responsibilities. They claim to represent about 85% of the manufacturing capacity in this market. They have never disputed the hazard. NPCA believes that consumer awareness likely needs reinforcement nationwide.

NPCA would have no problem with a national mandatory standard, and if CPSC goes in this direction, they would like to work with us to develop the optimum label language under the FHSA. It would be important to develop a label requirement that

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recognizes the relative importance of various risks associated with the product, including toxicity. The preemptive effects of a mandatory FHSA requirement was discussed. So far, Connecticut is the only State that has considered legislation in this area. It is possible that those manufacturers who label to meet Connecticut requirements will utilize such a label nationwide. However, some manufacturers distribute regionally, so not every manufacturer will label accordingly.

NPCA is planning to update their labeling guide, and would like CPSC to work with them to develop upgraded labeling, to be consistent with Connecticut or better. They would also like CPSC to consider providing comments to other States that may consider labeling in the future. CPSC said they could probably, at a minimum, provide informal comments on a new draft voluntary labeling guide.

NPCA promised to keep CPSC informed of their activities. It was agreed that continuing dialog was desirable.