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United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

MEMORANDUM

DATE: 6/01/99

TO : ES

Through: Sadye E. Dunn, Secretary, OS

FROM : Martha A. Kosh, OS

SUBJECT: Children's Sleepwear Laundering Procedures
Mattress Pads Laundering Procedures, Carpet and Rugs Laundering Procedures

ATTACHED ARE COMMENTS ON THE CF99-2

COMMENT	DATE	SIGNED BY	AFFILIATION
CF99-2-1	5/28/99	Jenan Al-Atrash Director, HHS	The Soap and Detergent Association 475 Park Ave. South New York, NY 10016
CF99-2-2 **(Mattress Pads)**	5/20/99	Patricia Adair Asst. Director	American Textile Manufacturers Institute 1130 Connecticut Ave, NW Suite 1200 Washington, DC 200360
CF99-2-3 **(Carpet & Rugs)**	5/20/99	Patricia Adair Asst. Director	American Textile Manufacturers Institute **address same as above**
CF99-2-4 **(Children's Sleepwear)**	6/01/99	Suzanne Hough Associate Product Services Division	American Textile Manufacturers Institute **address same as above**
CF99-2-5 **(Mattress Pads)**	6/01/99	Phillip Wakelyn Sr. Scientist Environmental Health & Safety	National Cotton Council of America 1521 New Hampshire Ave. N.W. Washington, DC 20036
CF99-2-6 **(Carpet & Rugs)**	6/01/99	Phillip Wakelyn Sr. Scientist Environmental Health & Safety	National Cotton Council of America **address same as above**

Children's Sleepwear Laundering Procedures Mattress Pads Laundering Procedures, Carpet and Rugs Laundering Procedures

CF99-2-7 (**Children's Sleepwear**)	6/01/99	Phillip Wakelyn Sr. Scientist Environmental Health & Safety	National Cotton Council of America 1521 New Hampshire Ave. N.W. Washington, DC 20036

CPSC/OFFICE OF
THE SECRETARY

1999 MAY 28 P 2: 21

COMMENTS OF THE SOAP AND DETERGENT ASSOCIATION On CHILDREN'S SLEEPWEAR, LAUNDERING PROCEDURES, CARPET AND RUG STANDARDS, LAUNDERING PROCEDURES MATTRESSES AND MATTRESS PADS

Consumer Product Safety Commission
May 27, 1999

SDA The Soap and Detergent Association

May 27, 1999

The Commission
Sadye E. Dunn, Secretary
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207

RE: Children's Sleepwear Laundering Procedures
Mattress Pads Laundering Procedures
Carpet and Rugs Laundering Procedures

The Soap and Detergent Association (SDA) provides the following comments addressing the Consumer Product Safety Commission's proposed amendments to the flammability standard for children's sleepwear, mattress pads and rugs in regard to its laundering procedures.

SDA is the national, non-profit trade association representing approximately 136 manufacturers of household, industrial and institutional cleaning products; the ingredients used in cleaning products; and finished packaging. SDA members produce more than 90% of the cleaning products marketed in the United States. Membership is open to U.S., Canadian and Mexican companies.

Established in 1926, SDA is dedicated to advancing public understanding of the safety and the benefits of cleaning products, and protecting the ability of its members to formulate products that best meet consumer needs. SDA serves both its member companies and the public by developing and sharing scientifically sound information about industry products with the technical community, policy makers, childcare and health professionals, educators, communicators, and consumers.

The SDA information addresses the human and environmental safety of cleaning products and their ingredients; the safe and effective use and disposal of cleaning products and their packaging; and the contributions of cleaning products to personal and public health. The information is distributed in the form of publications, educational programs, reports, seminars and conferences.

475 Park Avenue South, New York, N.Y. 10016 • (212) 725-1262 • Fax (212) 213-0685

The Consumer Product Safety Commission (CPSC) has proposed that it amend the laundering procedures used in testing children's sleepwear, carpet and rug and mattress and mattress pad flammability. The CPSC proposes that it adopt the American Association of Textile Chemists and Colorists (AATCC) test method which was recently revised in 1996 (AATCC Test Method 124-1996).

On September 15, 1998, the SDA urged the CPSC to amend its laundering procedures to reflect various conditions, such as wash temperature, dryer time and detergent type that reflect more closely the actual washing conditions of consumers. At that time, SDA provided the CPSC with information and recommendations with a proposed protocol that suggested methods for washing garments, carpets, rugs, mattresses, and mattress pads. The proposed protocol called for:

1. Lower wash and rinse temperatures than those currently recommended.
2. Control of water hardness.
3. Larger ballast load weight.

These recommendations are based on SDA member companies' best information on current consumer practice in the U.S. The SDA members believe that the laundering conditions set forth in the proposed protocol are more representative of the laundering conditions that Children's Sleepwear (Mattress Pads, Carpets and Rugs) are likely to be exposed to, in the course of their useful life than those offered by AATCC Test Method 124-1996.

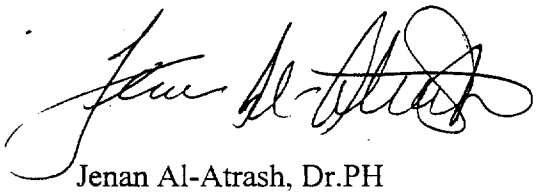
Both Government and industry are driving down the normal settings of hot water heaters in the interest of energy conservation, and laundry washing equipment manufacturers and cleaning products manufacturers have recognized this trend and have responded accordingly. The high wash and rinse temperatures recommended by AATCC Test Method 124-1996 is increasingly unlikely to be encountered.

Both water hardness and ballast load weight can impact method reproducibility. Specifying these two variables should eliminate a considerable source of error and improve the method reproducibility.

We understand the rationale for the CPSC proposed adoption of the AATCC Test Method 124-1996, but the AATCC may modify their method to reflect more current consumer habits and industry practices after CPSC has promulgated its final amendments. To avoid further need to amend the rules every time AATCC modifies its method, SDA recommends referencing the most current method year in the final rules, rather than identifying a specific year, which may later, become obsolete.

SDA also hopes that the Commission will reconsider our recommendations proposed in the September 15, 1998 letter for the implementation of the revised Laundering Procedure, and we remain available to provide whatever help may be needed to achieve a practical and effective standard.

Respectfully,



Jenan Al-Atrash, Dr.PH
Director, Human Health & Safety

AMERICAN TEXTILE
MANUFACTURERS INSTITUTE

May 20, 1999

Ms. Rockelle Hammond
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207-0001

Re: Mattress Pads, Laundering Procedures

Dear Ms. Hammond:

The American Textile Manufacturers Institute (ATMI) appreciates the opportunity to comment on the proposed amendments to the Standard for the Flammability of Mattresses and Mattress Pads *(64 Federal Register 13137; March 17, 1999)*.

ATMI is the national trade association for the domestic textile industry. Our member companies operate in more than 30 states and account for approximately 80 percent of all textile fibers consumed by mills in the United States.

ATMI supports the Consumer Product Safety Commission's proposal to revise the laundering procedures in 16 CFR 1632.5(b) to those specified in AATCC Test Method 124-1996. ATMI agrees that the proposed amendments are necessary in order to make the specified laundering procedures represent those currently used by consumers.

Thank you for the opportunity to comment on this issue. Should you have any questions or need any additional information, please contact me at 202-862-0518.

Sincerely,

Patricia K. Adair

Patricia K. Adair
Assistant Director
Textile Products and Standards

1130 Connecticut Ave., NW • Suite 1200 • Washington, DC 20036-3954
202-862-0500 • fax: 202-862-0570 • http://www.atmi.org

AMERICAN TEXTILE
MANUFACTURERS INSTITUTE

May 20, 1999

Ms. Rockelle Hammond
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207-0001

Re: Carpet and Rug Standards,
Laundering Procedures

Dear Ms. Hammond:

The American Textile Manufacturers Institute (ATMI) appreciates the opportunity to comment on the proposed amendments to the Standard for the Surface Flammability of Carpets and Rugs; Standard for the Surface Flammability of Small Carpets and Rugs *(64 Federal Register 13132; March 17, 1999)*.

ATMI is the national trade association for the domestic textile industry. Our member companies operate in more than 30 states and account for approximately 80 percent of all textile fibers consumed by mills in the United States.

ATMI supports the Consumer Product Safety Commission's proposal to amend the flammability standards for carpets and rugs and for small carpets and rugs by revising the laundering procedures in 16 CFR 1630 and 16 CFR 1631 to those specified in AATCC Test Method 124-1996. ATMI agrees that the proposed amendments are necessary in order to make the specified laundering procedures represent those currently used by consumers.

Thank you for the opportunity to comment on this issue. Please contact me at 202-862-0518 if you have any questions or need any additional information.

Sincerely,

Patricia Kadar

Patricia K. Adair
Assistant Director
Textile Products and Standards

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AMERICAN TEXTILE
MANUFACTURERS INSTITUTE

June 1, 1999
Via FAX

Ms. Rockelle Hammond
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207-0001

Re: Amendment to the Standards For the Flammability of Children's Sleepwear (64 FR 19126)

Dear Ms. Hammond:

The American Textile Manufacturers Institute (ATMI) is the national trade association for the domestic textile industry. Our member companies operate in more than 30 states and account for approximately 80 percent of all textile fibers consumed by mills in the United States.

We appreciate the opportunity to comment on the proposed revisions to the laundering procedures for the standards for the flammability of children's sleepwear, sizes 0-6X and 7-14 (64 FR 19126; March 17, 1999).

ATMI supports the Consumer Product Safety Commission's proposal to amend the standards for the flammability of children's sleepwear by revising the laundering procedures in 16 CFR 1615 and 16 CFR 1616 to those specified in the American Association of Textile Chemists and Colorists (AATCC) Test Method 124-1996. We believe that the proposed amendments are necessary to ensure that the specified laundering procedures (for detergent and operating characteristics of the washing and drying machines) represent those currently in use by consumers for home laundering.

Please feel free to call me at (202) 862-0502 if you have any questions about ATMI's comments.

Sincerely,

Suzanne Hough

Suzanne Hough
Associate
Product Services Division

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202/745-7805
202/483-4040 (FAX)

June 1, 1999

Ms. Rockelle Hammond
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207-0001

Re: Mattress Pads, Laundering Procedures

Dear Ms. Hammond:

These are the comments of the National Cotton Council (NCC) on the proposed amendments to the Standard for the Flammability of Mattresses and Mattress Pads (64 FR 13137; March 17, 1999).

The NCC is the central trade association of the US cotton industry. NCC members include producers of over 75% of the US cotton and cotton processing industries.

NCC supports the Consumer Product Safety Commission's proposal to amend the standard for the flammability of mattresses and mattress pads by revising the laundering procedures in 16 CFR 1632 to those specified in AATCC Test Method 124-1996. We agree that the proposed amendments are necessary in order to make the specified laundering procedures represent those currently used by consumers for home laundering.

Please contact me at 202/745-7805 if you have any questions or need any additional information.

Sincerely,

Phillip J. Wakelyn, Ph.D.
Senior Scientist, Environmental Health and Safety

National Cotton Council OF AMERICA
1521 New Hampshire Avenue, NW
Washington, DC 20036
202/745-7805
202/483-4040 (FAX)

June 1, 1999

Ms. Rockelle Hammond
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207-0001

Re: Carpet and Rug Standards, Laundering Procedures

Dear Ms. Hammond:

These are the comments of the National Cotton Council (NCC) on the proposed amendments to the Standard for the Surface Flammability of Carpets and Rugs; Standard for the Surface Flammability of Small Carpets and Rugs (64 FR 13132; March 17, 1999).

The NCC is the central trade association of the US cotton industry. NCC members include producers of over 75% of the US cotton and cotton processing industries.

NCC supports the Consumer Product Safety Commission's proposal to amend the flammability standards for carpets and rugs and for small carpets and rugs by revising the laundering procedures in 16 CFR 1630 and 16 CFR 1631 to those specified in AATCC Test Method 124-1996. We agree that the proposed amendments are necessary in order to make the specified laundering procedures represent those currently used by consumers for home laundering.

Larger carpets and rugs are not normally cleaned (laundered) by washing in a home washing machine. Other dry and wet processes are used by the consumer and contract cleaning services. In a separate action, CPSC will need to address those cleaning operations as acceptable alternative washing procedures.

Please contact me at 202/745-7805 if you have any questions or need any additional information.

Sincerely,

P/ Wakelyn

Phillip J. Wakelyn, Ph.D.
Senior Scientist, Environmental Health and Safety

National Cotton Council
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1521 New Hampshire Avenue, NW
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202/745-7805
202/483-4040 (FAX)

June 1, 1999

Ms. Rockelle Hammond
Office of the Secretary
Consumer Product Safety Commission
Washington, DC 20207-0001

Re: Children's Sleepwear, Laundering Procedures

Dear Ms. Hammond:

These are the comments of the National Cotton Council (NCC) on the proposed amendments to the Standards for the Flammability of Children's Sleepwear: sizes 0 through 6x and 7 through14 (64 FR 19126; March 17, 1999).

The NCC is the central trade association of the US cotton industry. NCC members include producers of over 75% of the US cotton and cotton processing industries.

NCC supports the Consumer Product Safety Commission's proposal to amend the flammability standards for children's sleepwear, sizes 0-6x and 7-14 by revising the laundering procedures in 16 CFR 1615 and 16 CFR 1616 to those specified in AATCC Test Method 124-1996. We agree that the proposed amendments are necessary in order to make the specified laundering procedures (for detergent and operating characteristics of the washing and drying machines) represent those currently used by consumers for home laundering.

Please contact me at 202/745-7805 if you have any questions or need any additional information.

Sincerely,

P/Wakelyn

Phillip J. Wakelyn, Ph.D.
Senior Scientist, Environmental Health and Safety