



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

February 28, 2017

Ms. Diana Pappas Jordan
Chair of STP 2201
Underwriters Laboratories Inc.
333 Pfingsten Road
Northbrook, IL 60062

RE: CPSC Staff Comments on UL's Proposed Second Edition of the Standard for Determining Carbon Monoxide Emission Rate of Portable Generators, UL 2201

Dear Ms. Jordan:

Thank you for providing U.S. Consumer Product Safety Commission (CPSC, or Commission) staff the opportunity to comment on Underwriters Laboratories Inc.'s (UL) proposed second edition of UL 2201, *Standard for Tests for Determining Carbon Monoxide (CO) Emission Rate of Portable Generators*, which is currently open for preliminary review.^a Staff offers the following suggestions for your consideration:

1. Where text in the proposal states, "between 18.0% and 18.5% by volume," change the text to "18.0 ± 0.1% by volume." This change will make 18.0 percent oxygen the mean target concentration during emissions sampling, as has been discussed and agreed upon by the task group that developed this proposal. Moreover, the tighter tolerance will narrow the allowable oxygen range, improving the repeatability and reproducibility of the results. During evaluation of the dilution chamber test method, CPSC staff found that this target oxygen concentration range was easily achievable with basic laboratory equipment.
2. Add temperature requirements for the period in the test procedure when the emissions are being measured. Specifically, add the underlined text to the beginning of the first sentence in section 6.5 "While maintaining the oxygen concentration at 18.0 ± 0.1% by volume and chamber temperature of 15 – 35°C (59 – 95°F), sample emissions...." This restores a temperature requirement that was in the previous draft versions of the test method.
3. Consider adding a new section to the proposal to allow reviewers to insert pass/fail CO emission rate limit(s) and renaming the proposal *Standard for Carbon Monoxide (CO) Emission Rate of Portable Generators*.

^a These comments are those of CPSC staff, and they have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

We look forward to continuing to work with UL on this very important issue of improving the safety of portable generators.

Sincerely,



Janet L. Buyer
Project Manager, Portable Generators



Matthew J. Brookman, P.E., PMP
Mechanical Engineer

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator