

CPSC MEETING LOG
UPHOLSTERED FURNITURE

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Meeting Between: CPSC staff and members of the Washington Textile Roundtable
Date of Meeting: November 27, 2001
Meeting Site: National Press Club, Washington, DC
Log Entry By: Dale R. Ray, Project Mgr., EC, (301) 504-0962 x1323 *[Signature]*
Participants: Peter Mayberry, INDA (Association of the Nonwovens Industry),
WTR Chairman
Jessica Franken, INDA
Hardy Poole, American Textile Mfrs. Institute
Patty Adair, ATMI
Phil Wakelyn, National Cotton Council
Richard Kimberly, Kimberly Consulting.
Mary Vane, DuPont
Michelle Storkan, Nat'l. Ass'n. of State Fire Marshals
Allyson Tenney, CPSC / Engineering
Dale Ray, CPSC / Economics

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U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

Summary:

This quarterly meeting of the Washington Textile Roundtable focused on CPSC's activities on upholstered furniture. ATMI asked Mr. Ray to present a report on the CPSC staff's October 2001 briefing package. The outline for Mr. Ray's talk is attached below. Attendees asked questions about specific provisions of the CPSC staff's latest draft small open flame standard, the schedule for a possible public meeting to discuss the information in the staff briefing package, and issues related to the NASFM's October 2001 withdrawal of its petition.

At this meeting, Mr. Mayberry announced that Ms. Adair would begin chairing the WTR, effective as of their next meeting in early 2002.

Attachment





2001 OCT 20 11:38 AM
U.S. CONSUMER PRODUCT SAFETY COMMISSION

U.S. CONSUMER PRODUCT SAFETY COMMISSION ACTIVITIES ON UPHOLSTERED FURNITURE*

**Washington Textile Roundtable
November 27, 2001**

**Contact: Dale Ray, Project Mgr.
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1. October 2001 Briefing Package

- Presents CPSC technical information**
- Revised draft small open flame standard**
- Staff recommendation: publicize info, get public feedback before considering regulatory options under small open flame proceeding**
- Staff recommendation: deny polyurethane foam petition**
- NASFM petition withdrawal**

2. The Continuing Fire Hazard

- Leading cause of fire deaths of any consumer product**
- 1998 addressable fire losses: 420 deaths, 1,080 injuries, \$120 million property damage**
- 1998 estimated societal costs = \$2.4 billion**
- Still no national standard addressing the open flame risk**

3. CPSC Testing & Analysis

- Establishes technical feasibility of a small open flame standard**
- Evaluate new product innovations**
- Basis for projected benefits of a standard**
- Information base to share with manufacturers, state / local / international regulators**

***The information presented in this document was prepared by the CPSC staff, and does not**

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This document is in the public domain, and may be freely copied or reprinted. The CPSC briefing

package is available on-line at:

<http://www.cpsc.gov/library/foia/foia02/brief/briefing.html>

4. Highlights of the Draft Small Open Flame Standard

--Objective: evaluate and reduce ignitability and flame spread, thereby limiting the early stages of fire growth

--Two basic test locations: seating areas & dust covers (where most ignitions occur)

Small Open Flame Performance Requirements

Test	Ignition Source	Maximum Flaming	Maximum Smoldering/Glowing
Seating Area	Small butane flame, 20 sec.	2 min.*	15 min.
Alternate Seating Barrier	U.K. (BS 5852) Crib #5	10 min.	60 min.**
Dust Cover	Small butane flame, 20 sec.	2 min.*	15 min.

*with no burning to any edge of the test specimen

**with limited spread of combustion of foam filling material, no dripping, and no uncontrolled flaming

--Small open flame tests:

Combinations of FR seating materials, including fabrics, generally necessary; FR fillings or self-extinguishing interliners may be used, but not required; Nonwoven dust covers generally necessary.

--Optional seating barrier test:

Fire-blocking barriers generally necessary; FR fabrics not needed. Provides adequate level of safety while maintaining fabric choice.

--Sampling plan for establishing compliance for fabrics / barriers:

Similar to children's sleepwear regulations; 3 levels

Fabric / Barrier Sampling Requirements

Sampling Level	# Samples (@ 4 specimens each)	Production Unit (max. # lin. yds.)*
Initial	3	1,000
Normal	2	5,000
Reduced	2	10,000

*Multiple smaller runs may be tested together; short runs < 50 lin. yds. exempt.

Initial Sampling: products for which compliance is undetermined

Normal Sampling: products consistently passing initial sampling tests

Reduced Sampling: products consistently passing normal sampling tests

--Recordkeeping to establish information trail for finished products; allows manufacturers, importers & suppliers to identify sources of materials

5. Economic Issues

- Evaluates significant available alternatives; provides basis for reducing potential economic burden, especially on small firms
- CPSC staff analysis revised to consider issues raised in industry studies, reflect latest version of draft standard
- A small open flame standard would have net benefits to the public

6. FR Chemical Risk Assessment

- Toxicity reviews of 16 candidate chemical categories under FHSA
- Evaluated risk for 8 compounds (not same as NAS 8):
 - No hazard: 4 compounds (DBDPO, HBCD, CPE, PA);
 - Probably no hazard: 1 compound (EHDP);
 - Chronic hazard: 1 compound (TDCP);
 - Incomplete data: 2 compounds
 - AT (inhalation route only)
 - THPC (identity / toxicity of migration products)
- EU risk assessment: no risk for higher BFRs; "precautionary principle"

7. Progress On Other Standards Activities

- ASTM E5.15: no action on test method
- SOFTC: continuing research to develop mass loss test method
- Industry research to develop more fire-resistant products
- California BHF: upcoming proposal to revise TB-117, possible composite & component requirements on small open flame

8. Conclusions

- Available information suggests a small open flame standard is technically & economically feasible
- CPSC briefing package presents government research, requests public input before staff makes recommendations to Commission on regulatory options
- Possible Public Meeting: early – mid 2002
- Challenges to textile industry following August 2000 Position Statement:
 - Develop products and materials for residential upholstered furniture
 - Commitment to participation in developing a national standard