

CPSA 6 (b)(1) Cleared

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## LOG OF MEETING

## DIRECTORATE FOR ENGINEERING SCIENCES

**SUBJECT:** Meeting With Petitioner -- CP94-1, Petition for  
Development of a Safety Standard for Portable Electric  
Heaters

**DATE OF MEETING:** March 15, 1995

**PLACE:** CPSC Engineering Laboratory, Gaithersburg, MD.

**LOG ENTRY SOURCE:** Edward W. Krawiec

**DATE OF ENTRY:** March 20, 1995

**COMMISSION ATTENDEES:** Andrew Bernatz, LSEL  
Allen Brauningner, GCRA  
Erlinda Edwards, ESEE  
Terry Karels, ECPA  
Rohit Khanna, ESME  
Kimberly Long, EPHA  
Edward Krawiec, ESEE  
Carolyn Meiers, EPHF

**PETITIONER:** Bernard A. Schwartz

**NON COMMISSION ATTENDEES:**

Tom Blewitt, Underwriters Laboratories Inc  
Todd Grintz, Lasko Metal Products  
Michael Kleine, Association of Home  
Appliance Manufacturers  
Wayne Morris, Association of Home Appliance  
Manufacturers  
Joseph O'Neill, Slant/Fin Corp.  
Thomas Turner, Holmes Products

**SUMMARY OF MEETING:** Ed Krawiec introduced the members of the CPSC Project Team for the Portable Air Heater Petition. He then provided a brief overview of the Commission's policies on the conduct of meetings open to the public and a status report of the Team activities. In response to Mr. Krawiec's request, the petitioner, Mr. B. Schwartz, provided a detailed description of the method and materials he had used to conduct the tests described in his response to the Commission's 9/23/94 Federal Register Notice concerning his petition.

Mr. Schwartz brought the two heaters which he had purchased for his test work to the meeting. According to the date coding on the packages, both heaters were packaged after the April, 1991 Effective Date for the revised Underwriters Laboratories Inc. (UL) requirements which were intended to address concerns similar to

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those of the petition. Mr. Schwartz also brought a roll of surgical cotton which he had purchased from a local store and a piece of heavy cotton fabric similar to that which might be used to upholster furniture. Mr. Schwartz explained that he did not have ready access to the "Haitian cotton" fabric described in the petition at the time that he decided to conduct his tests. In his opinion, the material used in his test work was as likely or less likely than the Haitian cotton material to ignite when exposed to the portable heaters.

Mr. Schwartz demonstrated how he rolled the cotton into an approximately 3 inch diameter cylinder and how he wrapped and fastened the heavy cotton fabric around the cylinder. He then showed how the test cylinder was fastened to a piece of "common box cardboard" which serves more as a handle for the assembly than as an ignition indicator. Using the actual heaters which he had tested, Mr. Schwartz demonstrated placement of the test cylinder at various locations in front of the heaters' output grills.

The participants then adjourned to a laboratory facility where the heaters could be energized. Both heaters operated with "visibly glowing elements." According to the current edition of UL 1278, Standard for Movable and Wall- or Ceiling Hung Electric Room Heaters, a heater which operates with visibly glowing elements is required to carry cautionary markings in addition to or "stronger" than those required for heaters which do not operate with glowing elements.

CPSC Team members then explored a range of issues with the petitioner. Those issues centered on the petitioner's rationale for his proposed test protocol and his theories on what differences between the two heaters would account for only one of the heaters causing ignition. Mr. Schwartz responded that his test protocol was based on what he believes to be reasonable scenarios -- notably, the possibility that a portable heater could be accidentally positioned such that its output grill is in contact with a corner of a piece of upholstered furniture. He also indicated that there are a very large number of variables associated with ignition and, consequently, that he did not want to speculate on why one heater caused ignition while the other did not. He did indicate that he believes that the evaluation of the heat-flux pattern generated by an appliance could be a reliable indicator of the possibility of the appliance causing accidental ignition.

With the consent of the petitioner, Mr. Krawiec then invited the outside observers to raise any issues which they thought significant to the information discussed to that point in the meeting.

The meeting produced the following new or additional information considered significant to the petition:

- Both heaters were packaged after UL's 4/91 Effective Date for its revised requirements.

- Both heaters were radiant heaters.
- The heater which caused ignition during the petitioner's tests was rated 1500 watts while the heater which did not cause ignition was rated 1320 watts. No method of controlling the input energy was employed.
- The petitioner had conducted his tests outdoors, in an open-faced box like enclosure which provided at least six inches clearance from the sides and back of the heater under test. The test enclosure could not prevent air flow (wind) across the test assemblies but the petitioner had conducted his tests on consecutive days during which there was relatively little wind.
- The petitioner had not used the "Haitian cotton" fabric specified in the petition. The petitioner believes that the material used in his tests was no more likely to ignite than Haitian cotton.

Mr. Schwartz agreed to donate to the CPSC the two heaters and the other test materials which he had brought to the meeting.