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MEETING LOG

DIRECTORATE FOR ENGINEERING SCIENCES

SUBJECT: Gas Range/Oven Emissions Meeting between CPSC staff and the Gas Industry

PLACE: CPSC Headquarters, Room 410B/C

MEETING DATE: March 25, 1998

TIME: 9:30 am

LOG ENTRY SOURCE: Ronald A. Jordan

RAJ

ENTRY DATE: April 15, 1998

COMMISSION ATTENDEES:

See attached sign-in sheet for Commission attendees.

NON-COMMISSION ATTENDEES:

See attached sign-in sheet for Non-Commission attendees.

MEETING SUMMARY:

CPSC staff and representatives from the gas range industry met today to discuss the CPSC's plan for testing emissions of CO and NO_x from gas ranges. The meeting began at about 9:30 Ron Jordan and Don Switzer gave a brief presentation of the background and allegations that have been made that cause CPSC to want to investigate this issue further. By about 10:30 a.m., the discussion began. My comments are in parentheses.)

A representative of *Maytag* stated that he was not certain of the reason for the aluminum foil test. He stated that there was no doubt that it would increase the CO emissions. He also suggested that it may affect baking quality. (The impact on baking quality, although possible, may not be relevant. Many users may not be aware of the impact.) He wondered why we were conducting this test when it was fairly obvious that it would cause elevated CO levels in the room.

Don Switzer replied that it was a reasonably foreseeable misuse of the product. He also suggested that it may be possible to design ovens in a way that prevented this problem from occurring. Or alternatively, it may be possible to better instruct consumers on how to use foil in the bottom of their ovens more safely.

Irv Billick asked whether the details and the raw data be made available. *Don Switzer*

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indicated that he would like to make as much of the data available as he could. However, there were caveats. They could not identify who the manufacturers or models were and he would release the data until after CPSC had finished its report. He also indicated that there may be legal issues related to releasing some of the data.

Irv Billick stated that the testing was premature. He stated that we should do more failure analysis and IDI's and determine what exactly we needed to test before doing this kind of test. (This theme was repeated several times by several different industry participants during the meeting.) *Don Switzer* responded that he agreed with the gist of the statement. However, he also stated that manufacturers are the ones that would that type of data more than the CPSC does. Furthermore, when we do IDI's it is sometimes a while after an incident took place and the information needed may not be available to CPSC investigators.

An *Industry representative* asked if we actually had any death certificates naming ranges as the cause of death. *Kim Ault* replied that we did. She also stated that the level of detail on death certificates is not great.

There was another exchange along the lines of the testing being premature. An *Industry representative* (Wayne?) said that this testing may be appropriate at some point, but now is not the time. First we need to know how ranges are being used and how they are failing. Then we should do the testing. *Don Switzer* stated that manufacturers, not CPSC have this data. The industry spokesman replied "Why didn't you ask for it?" This was another common theme. Both sides asked why the other side had not asked for data.

An *Industry representative* stated that with so few deaths attributed to CO poisoning from ranges it should be very manageable to investigate all of these ranges in depth. The reply from *CPSC* seemed to be along the lines that this actually required more resources than it would seem. Much of the death reports come to us well after the incident has occurred.

A *Maytag spokesman* stated that every manufacturer warns about using aluminum foil. *Don Switzer* replied that we did know this. Another *Industry representative* stated without a doubt that lining the bottom of the oven with aluminum foil will affect the CO output. *Warren Porter* asked directly "What data do have on this and when can you provide it to us? He also asked what precisely the instructions were that manufacturers relayed to consumers about the use of aluminum foil.

Irv Billick stated that part of the study that called for running the ranges until equilibrium was reached was "ridiculous." He stated that the tests should be run following consumer use patterns only. (However, if we are testing ranges when used as space heaters, they may in fact be on for several hours at a time.)

An *Industry representative* stated that during the tests of ranges used space heaters we should also check the temperature of the room.

An *Industry representative* stated that pilot lights still make up a segment of the market. He stated that in the late 1980s there may have been 800,000 pilot light ranges shipped annually.

Today the figure may be about 400,000. (This would probably be 10 to 25 percent of the shipments.) Primarily these are used in manufactured housing, low income housing, and to replace existing ranges.

In response to a question, *Don Switzer* stated that we are measuring NO_x primarily because we can do it. We do not have a particular interest in it at the time, although there are some concerns about it. And since we are doing these tests, we may as well take the opportunity to get the measurements.

There was some discussion about a Portland State study that CPSC had a draft copy of but that, allegedly, Portland State had not shared with industry. *Industry* pressed CPSC to release the study to them. *Don Switzer* replied that they could request it through FOIA, but that he would have to clear its release through OGC. He was not sure if it was proper for CPSC to release this study.

A representative from *GE* asked why we were focusing on aluminum foil as a cause of elevated CO levels. He suggested an alternative theory that improper conversion from oil or propane to natural gas may be responsible for elevated CO.

After another exchange regarding the justification for doing the study, both *Andy Stadnik* and *Don Switzer* stated that people with credentials that have to be respected have made allegations about the safety of some ranges and we do not have the data to refute them. It is incumbent on us to take the allegations seriously and get the data that will allow us to either refute the allegations or investigate them further if needed.

An *Industry spokesman* stated that they had a lot of concerns about the safety of CPSC personnel during the aluminum foil tests. His concern is that the flame may go out and an explosion result. *Don Switzer* attempted to assure him that the lab was set up and prepared for such a contingency.

Irv Billick raised questions about the humidity during the range top tests. He suggested that the humidity may cause problems with measurements. He suggested that an "ANSI" pot could be used which recondenses the vapor back into the pot. He also asked whether the oven tests would be used with or without a load. *Warren Porter* asked *Irv Billick* for his recommendation. This prompted a general discussion. Some in industry suggested that a load, by reducing the volume of air in the oven could affect CO production. Others thought that if the oven was being used for space heating, consumers would not be cooking food if their primary purpose was space heating.

Another *Industry representative* raised the issue about the food itself emitting CO as it cooks. He stated that this is a general cooking issue and not specific to gas ranges.

Another *Industry representative* raised issues about the air pressure in the chamber, the air flows, and the relevance of the equation. This discussion was very technical and would probably be followed up between the representative and *Warren Porter*.

An *Industry Representative* asked if we had reached consensus about running the tests until equilibrium is achieved. *Don Switzer* replied that we would look into it.

An *Industry representative* asked how we would measure NO_x and whether a nitrous acid filter would be used. *Warren Porter* replied that we would measure total NO_x and NO and derive NO₂ from this measurement. He said we were not going to use a nitrous acid filter.

Don Switzer and *Ron Jordan* clarified that the oven tests would not be done simultaneously while the range top burner tests were being performed.

There was some discussion about whether some "gunk" should be used during the self-cleaning tests to simulate real world conditions. Of course, it is possible that some CO produced under these circumstances would be from the gunk being cleaned. It was also clarified that the self-cleaning tests would last the length of the self-cleaning cycle, not to equilibrium.

Irv Billick and *Warren Porter* both agreed that some groups would boil water on range tops primarily as a comfort device. However, *Porter* asked for advice on whether boiling water would make a difference in the emission rates. He suggested that it might affect emissions only at the beginning of the test. Therefore, he seemed to be questioning whether it would be necessary to use any pots during the range top tests.

An *Industry representative* asked about the reproducibility of the tests. He wanted the tests to be run several times to see how reproducible they were. He said this was especially important for the aluminum foil test. *Don Switzer* seemed to agree and said that we would run the tests more than once to the extent that our resources allow us to do this.

An *Industry representative* concluded the meeting essentially by saying that the design of the study was basically sound and thorough. However, he still questioned the timing. He re-echoed the theme that we needed more information on how these were being used, how they were failing, and exactly what we were trying to show in the testing. He suggested that we were trying to find something that would be problem and then see if it was actually occurring. He suggested that this was backwards.

cc:

Office of the Secretary
Colin Church
ESEE Chronological File

Attachments

Sign-In

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