



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

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July 29, 2004

Re: Equivalency of Methenamine Tablets
Standard for the Flammability of Carpets and Rugs
16 C.F.R. Parts 1630 and 1631

To Whom It May Concern:

This letter responds to inquiries recently received by the U.S. Consumer Product Safety Commission (CPSC) concerning the equivalency of methenamine tablets formerly manufactured by the Eli Lilly Company and similar tablets currently produced by other manufacturers.

As you know, the CPSC administers two flammability standards for carpets and rugs: 16 Code of Federal Regulations (C.F.R.) Part 1630 – Standard for the Surface Flammability of Carpets and Rugs and 16 C.F.R. Part 1631 – Standard for the Surface Flammability of Small Carpets and Rugs. Both standards require a methenamine tablet as the standard ignition source for flammability performance testing. The standards define the ignition source as a methenamine tablet, weighing approximately 0.149 grams (2.30 grains), sold as Product No. 1588 in Catalog No. 79, December 1, 1969 by the Eli Lilly Company, or an equal tablet.

In April 2002, Commission staff learned that the Eli Lilly Company was no longer producing the methenamine tablets specified in the carpet and rug standards. Although the standards allow for the use of an "equal" methenamine tablet and give parameters for chemical composition and weight of the tablet, they do not provide any guidance on determining whether tablets from alternative sources are "equal" to those manufactured by the Eli Lilly Company. Therefore, in an effort to make such a determination, the Commission's Laboratory Sciences staff conducted testing designed to evaluate the weight, chemical composition, and combustion characteristics of presently available brands of methenamine tablets relative to each other and those produced by the Eli Lilly Company. The outcome of this testing indicates that tablets consisting of pure methenamine and weighing approximately 0.149 grams may be considered equivalent to the tablets formerly produced by the Eli Lilly Company. Therefore, tablets meeting these criteria may be used for purposes of determining conformance with the carpet and rug standards.

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The Commission staff is considering recommending to the Commission that it update the carpet and rug standards to reflect the above mentioned findings. Please contact Jason Hartman at (301) 504-7591, if you have any questions.

This interpretation is based on the information currently available to the staff and has not been reviewed or approved by the Commission.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alan H. Schoem".

Alan H. Schoem