



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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TRANSMITTED VIA EMAIL

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

RE: CPSC Staff Comments on the Changes in Requirements Regarding the Scope of UL's
*Proposed Second Edition of the Standard for Determining Carbon Monoxide (CO) Emission
Rate of Portable Generators, UL 2201*, Opened for Review, Comment, and Ballot on 3-6-
2020

Dear Ms. Jordan:

U.S. Consumer Product Safety Commission technical staff (CPSC staff or staff) appreciates the opportunity to review a proposed change to the second edition of UL 2201, which was opened for the standards technical panel (STP) to review on March 6, 2020. Comments and ballots are due by April 6, 2020.¹ The proposal under consideration is to add a requirement that states generator assemblies that are part of welding and plasma-cutting machines are excluded from the scope of the second edition of UL 2201.

¹ The comments or views expressed in this letter are those of the CPSC staff, and they have not been reviewed or approved by, and may not reflect the views of, the Commission.

Staff does not support the subject proposal. The second edition of UL 2201 consists solely of requirements intending to mitigate the carbon monoxide (CO) poisoning hazard of portable generators, including generators that are part of welding machines and plasma cutters. The first edition of UL 2201, cited by the proposal's submitter as excluding these products, did not address the CO hazard, nor do the three standards that the submitter also cited in the proposal.² Furthermore, from 2006 through 2018, CPSC databases have records of at least eight non-work-related consumer deaths resulting from four separate CO poisoning incidents that involved products that are the subject of this proposal.³ Exempting generator assemblies that are part of welding and plasma-cutting machines from the second edition of UL 2201 would allow these products to continue to emit hazardous levels of CO that have poisoned and killed consumers. For these reasons, staff casts a negative vote for the proposal.

Again, thank you for the opportunity to review this proposal.

Sincerely,

Janet Buyer

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator

² The proposal states that this "equipment is covered by one or more of the following: UL 551, Transformer-Type Arc-Welding Machines, or NEMA/IEC 60974-1, Arc Welding Equipment – Part 1: Welding Power Sources, or NEMA/IEC 60974-6, Arc Welding Equipment – Part 6: Limited Duty Equipment."

³ IDI reports 180515HCC3855, 060301HCC2409, 110118HCC2278, and 200226HCC2319.