

U.S. Consumer Product Safety Commission

LOG OF MEETING

SUBJECT: Meeting of Portable Generator Manufacturers Association (PGMA) with staff

DATE OF MEETING: February 15, 2017

LOG ENTRY SOURCE: Janet Buyer, Engineering Sciences

DATE OF LOG ENTRY: February 16, 2017

LOCATION: CPSC Headquarters, Bethesda, MD

CPSC ATTENDEE(S):

Name	Affiliation
Susan Bathalon	CPSC
Matt Brookman	CPSC
Janet Buyer	CPSC
Stephen Hanway	CPSC
Matthew Hnatov	CPSC
Sandy Inkster	CPSC
Rik Khanna	CPSC
Charu Krishnan	CPSC
Mark Kumagai	CPSC
Barbara Little	CPSC
Caroleene Paul	CPSC
Joel Recht	CPSC
Charles Smith	CPSC
Andrew Trotta	CPSC
Troy Whitfield	CPSC

NON-CPSC ATTENDEE(S):

Name	Affiliation
Ed Krenik	Bracewell
John Lee	Bracewell
Sean Oberle	PSL
Susan Orega	PGMA
Greg Wischstadt	PGMA/Generac

SUMMARY OF MEETING:

- **Greg Wischstadt stated that PGMA membership has a “strong consensus” of more than 2/3 of their members for support of a proposal they are developing for PGMA’s G300 standard to address CO deaths that includes a shutoff-only**

approach. This is a change from the approach that they had briefed staff on in September 2016 that allowed the option of either low emissions or shutoff. They feel they have a pathway for it to work. They stated that their approach is targeting the deaths from indoor use only.

- Generac has made prototype generators with low CO emissions and even ultra-low CO emissions, well below the limits in CPSC's proposed rule, and have made prototype generators with a shutoff system based on CO detection. They have done some empirical testing of these prototypes and also modeling based on some files they received in response to their FOIA request to CPSC. They claim the shutoff concept will save more lives, though no supporting data was provided.
- Mark Kumagai asked if Generac can share information about their prototype generator with the shutoff system and any of their findings. Mr. Wischstadt, speaking on behalf of Generac, not PGMA, said Generac is willing to share that information in a closed meeting with staff after they have completed their analyses based on modeling they still need to perform using files they have not yet received from their FOIA request with NIST.
- Mr. Wischstadt explained in broad terms that the concept for the proposed requirements for G300 is to have a test method to validate detection of CO and shutdown. The test would be done in a chamber, which would be roughly 10x12x12 feet, and the performance standard would be that the concentration of CO in the chamber would not be allowed to exceed some to-be-determined value at any time. They are modeling the concentration in the chamber as a source to migrate into the house and modeling COHb levels in the house with that source present. They intend for the CO concentration limit in the chamber to translate to a COHb level of somewhere between 20% and 40% but did not specify where the occupants would be relative to the generator location. The test method is meant to be representative of the conditions documented in CPSC generator CO-poisoning incident reports; however, no details were given on the conditions in the test chamber such as air exchange rate. They indicated that the proposal may also include some sort of requirement for an alarm to indicate to the user that the generator has shut down and entering the space where the generator is located could be hazardous.
- Mr. Kumagai asked if there are or will be requirements to test for resistance to nuisance shut offs. Mr. Wischstadt said Generac has done some work on avoiding nuisance shutoff because they agree that they don't want to create a system that won't allow the generator to be operated in a proper location. He said the PGMA technical committee has been tasked to address the issue of nuisance shutoffs.
- Steve Hanway asked if they are working to develop requirements to assure tamper resistance to avoid consumers disabling sensors, since consumers may try to disconnect the detection feature if they realize it is making the generator shut off. Mr. Wischstadt said it is under discussion within the technical

committee, but added that he doesn't believe they need to be entirely responsible for someone willfully defeating a safety system.

- Sandy Inkster asked if PGMA plans to address the scenario where the exhaust infiltrates indoors from generator operation outside. They replied they are only focused on the indoor use scenario, which Susan Orenge said deals with 95% of the deaths.
- Dr. Inkster also asked if they will have requirements for the durability and reliability of the detection shutoff system. Mr. Wischstadt said the technical committee is working on that.
- Chuck Smith asked why 25-30% of their membership opposed the shutoff-only approach. Mr. Wischstadt said that these members are concerned about durability but if the technical committee addresses that, and his analyses show them it would save more lives, he feels confident there would be unanimous support for it. However, unanimous approval is not required to achieve consensus.
- Mr. Kumagai asked what PGMA's timetable is for their proposal. Mr. Wischstadt said there is no firm timetable yet, but he hopes to finalize the proposal and have an internal vote of PGMA members to release the proposal to a canvass committee for review and ballot in March. They have initiated a wide search for people to serve on the canvass committee. He added that once their proposal has been released to the canvass committee for review and ballot, PGMA will hold a technical summit similar to the one they held in March 2016, inviting all the same attendees as well as others so they can explain the proposal and all their findings and research behind it.
- Ed Krenik asked if it would take a Commission vote to change the date of the public hearing. He indicated they may ask for a delay because they want to complete their analyses discussed above and present that at the hearing but they don't yet have the files they need from NIST to be able to do that. Barbara Little informed them it is up to the Commission to change the date of the hearing. Janet Buyer suggested that they prioritize the scope of all the files they requested in their FOIA request to NIST and then contact NIST to ask if NIST can send the most pertinent files Generac needs for their analyses first, instead of waiting to compile all the files PGMA requested before sending any files.
- Ed Krenik said that PGMA has suspended their contract with Exponent that PGMA initiated to see how the mandatory hazard label could be improved. He said they suspended this based on a memo in the NPR package that indicated staff does not expect that improvements in the label will be adequate to address the CO hazard. He said PGMA doesn't plan on restarting that effort, but would consider doing so if staff felt it would be worthwhile.