U.S. Consumer Product Safety Commission
LOG OF MEETING

SUBJECT: PGMA meeting with CPSC staff following up on Technical Summit on Carbon Monoxide (CO) Hazard Mitigation for Portable Generators

DATE OF MEETING: September 6, 2016

LOG ENTRY SOURCE: Joel Recht, Engineering Sciences

DATE OF LOG ENTRY: September 23, 2016

LOCATION: CPSC Headquarters, Bethesda, MD

CPSC ATTENDEE(S):

Name	Affiliation
Matt Brookman	CPSC
Janet Buyer	CPSC
Stephen Hanway	CPSC
Matthew Hnatov	CPSC
Sandy Inkster	CPSC
Charu Krishnan	CPSC
Mark Kumagai	CPSC
Barbara Little	CPSC
Lawrence Mella	CPSC
Joel Recht	CPSC
Charles Smith	CPSC
Timothy Smith	CPSC
Andrew Trotta	CPSC

NON-CPSC ATTENDEE(S):

Name	Affiliation
Ed Krenik	Bracewell
Patricia Hanz	PGMA
John Lee	Bracewell
Sean Oberle	PSL
Susan Orenga	PGMA
Greg Wischstadt	PGMA

SUMMARY OF MEETING:

- PGMA provided information on work they have done since the technical summit in March.

- PGMA representatives responded to the staff letter[1] requesting information about several topics:
    - PGMA's methods and calculations supporting a graph PGMA presented at the summit about the relationship between CO deaths and incidents from portable generators per million "portable generator opportunities."
        - Susan Orenga and Greg Wischstadt stated that the data were based on confidential business information of Generac (which Mr. Wischstadt also represents), and that Generac would like to share that information with staff at some time in the future in a closed meeting.
    - The number of manufacturers that certify their products to the PGMA G300 standard.
        - PGMA representatives responded that all members were working towards developing new products all of which they could self-certify to G300, but that existing products were not yet self-certified to meet the standard, as they stated that the G300 standard had only received ANSI recognition in June of 2015, little more than a year before this meeting.
- PGMA reported on continued efforts with their "Take it outside" campaign, including a targeted outreach effort to provide educational outreach in advance of the recent storm in Florida, including working closely with media.
- PGMA reported that they had engaged Exponent in an effort to use focus groups to study possible improvements to the CPSC mandatory label on portable generators. Also, PGMA reported that they had previously conferred with CPSC staff about the preliminary results of the first two focus groups and would consider CPSC staff input to help guide the remaining studies.
- PGMA announced that their technical Committee was opening the G300 standard for revision, stating that the PGMA board was unanimous in deciding to include a focus on the CO hazard in the next revision of the standard at some future time. They stated that the PGMA technical committee had been meeting privately in weekly meetings since April to form a "framework" for a performance based standard. PGMA stated that they intend to develop this framework into a standard for inclusion into G300 by using the canvass process, that they would draw from other standards and ideas, and target "the majority of misuse behaviors" with a focus on the scenario of use in a fully-enclosed space. PGMA stated that they believed that addressing CO hazard in other than fully-enclosed spaces would be difficult to set a standard for.
- PGMA stated that they do not yet have a detailed proposal for a standard or a test method, but that the framework was to have a dual approach, where one way to meet the approach would be through reduced CO emission rates and the alternative way to meet the framework concept would be based on a to-be-determined performance standard involving testing a generator in a fully-enclosed, fixed-volume room with a concept that when a portable generator is tested in that space the CO level must never exceed some, as yet undetermined threshold value. PGMA described the framework

[1] https://www.cpsc.gov/Global/Regulations-Laws-and-Standards/Voluntary-Standards/Portable-Generators/CPSCRechtLettertoPGMAMay132016inresponsetoPGMAletterdatedApril202016.pdf

to include concepts that some tamper resistance would be required, that some robustness to work over the service life expectancy of the generator would be required, and that there would be some supervision of the technology.

- Staff asked about the levels for the threshold value of the CO level in the fully-enclosed test space, the duration of CO emissions allowed and interplay between CO concentrations and durations of exposure. PGMA responded that they have not yet determined that, but the intent was not to make portable generators safe to use indoors. Staff also asked about the meaning of enclosed spaces and whether PGMA would consider semi-enclosed spaces such as open garages and covered porches, but PGMA stated they were focusing on indoor use.
- Staff requested a copy of the framework, but PGMA responded that their board had not yet approved releasing a copy, and when asked, no date was provided.
- PGMA asked how CPSC staff could be engaged and offer expertise to PGMA's technical committee and Joel Recht, CPSC, responded that public meetings where CPSC staff could participate would be the best way. Mr. Recht stated that staff would participate in such meetings at PGMA's locations or at CPSC facilities.
- Mr. Recht told PGMA staff that staff expects to provide a notice of proposed rule (NPR) briefing package to the Commission in the next several weeks, and stated that just as he had discussed at the March technical summit that even if the Commission decides to issue the NPR, that does not mean that work to develop a voluntary standard would be impacted, but rather that staff would continue to work with PGMA with a goal of developing a voluntary standard that would effectively address the hazard of CO from portable generators and which would be widely complied with. Mr. Recht urged PGMA to continue their efforts to develop such a voluntary standard with public meetings to include CPSC technical staff, even if an NPR is issued.