Thursday, December 4, 2014

Meeting summary excerpt

VI SECTION 3 – GENERAL REQUIREMENTS

C. Table 3.2 material specific analyses (DWA-61-2014-10)

Motion: Form a task group to review proposed material specific analyses under Table 3.2 before sending to formal ballot. F. DiFolco motioned; P. Greiner seconded.

Discussion: D. Purkiss explained that there are often components that contain materials for which it is not possible to obtain the specific material type as listed under Table 3.1. An example of this would be a subcomponent in a mechanical device that may contain an elastomer material, but for which formulation information is not available. D. Purkiss suggested that in this case, an expanded test battery for those rare section 8 and 9 devices be specified (process media and coatings would be excluded). He proposed the addition of Table 3.2 to address general material types not covered under Table 3.1, such as metals, plastics, elastomers, adhesives, and lubricants. Another all-inclusive test battery option would be available for those materials that don’t fall under any of the above categories. He noted that this test battery would be quite extensive but very rare.

T. Spoden stated his opinion that this seems very restrictive for the manufacturer. He stated that he would like to see the testing waived for certain exemptions. D. Purkiss noted that there is a similar waiver under Table 3.1, but in this case definitive formulation information is not available to rule out that a contaminant is not present. J. Ballanco added that in the case where a manufacturer won’t tell you the material formulation for a product but advertises “formaldehyde free,” for example, there must be some way to get this information. F. DiFolco expressed concern that specifying a particular test method is restrictive. Based on these concerns, the group agreed to the formation of a small task group to take a closer look at the proposed material specific analyses under Table 3.2 before sending it to formal ballot.

Vote: All in favor.

Motion passed.

TG: D. Purkiss (chair); T. Reski; T. Spoden; D. Frederick; F. DiFolco