

Subject 2129

July 10, 2017

SUMMARY OF TOPICS

The following changes in requirements to the Standard for Halocarbon Clean Agent Fire Extinguishers, UL 2129, are being proposed for preliminary review and comment only:

- 1. For Preliminary Review Only: Revise clauses 19, 61.2 and 72.1 to change requirements for packaging of extinguishers***

COMMENTS DUE: July 24, 2017

This proposal is for review and comment only (no ballot at this time). Please note that comments on a preliminary review document will not receive a response from the proposal author through CSDS. Instead, the proposal author will be asked to review the comments and adjust the proposals and/or supporting rationale as the author determines to be appropriate. The preliminary review process is an informal mechanism that provides authors with the opportunity to refine their proposals before they advance to the next stage in UL's standards development process.

In some cases, the author of the proposals may choose to discontinue them. In this case, the author need not do anything after preliminary review has ended. Normally, the next step in the process is the more formal STP ballot and stakeholder review process. Only comments posted during the STP ballot and stakeholder review process will be provided with a response in CSDS.

UL's goal is to have no interest category comprise more than one-third of the STP membership balance. To improve the current balance for STP 605, UL is looking for participants in all interest categories, except Producers. Definitions for these interest categories are available on the Standards STP Internet site:

<http://ulstandards.ul.com/develop-standards/participation/interest-categories/>

If you are interested in applying for STP 605 membership or are aware of potential candidates for this STP, please contact the STP Project Manager Mark Ramlochan, Mark.Ramlochan@ul.com.

For your convenience in review, proposed additions to existing requirements are shown underlined and proposed deletions are shown ~~lined-out~~.

- 1. For Preliminary Review Only: Revise clauses 19, 61.2 and 72.1 to change requirements for packaging of extinguishers**

RATIONALE

Proposal submitted by: Nik Schaefermeyer, P3 engineering GmbH

The requirement of clause 61.2, to include a bracket within the package of each extinguisher, leads to high amounts of wasted material. The brackets for extinguishers used in transports, like cars, aircraft or trains, normally have special requirements for the design and installation of extinguishers, and the

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lifetime of the brackets is normally much higher than the one of the extinguishers (25 years for bracket vs. 12 years for extinguisher). If an extinguisher needs to be replaced in a transport, the old bracket will remain in its place, while the new bracket gets thrown away. This creates avoidable amounts of waste, not including the efforts for production and transport of the bracket.

The proposed adaption of clause 61.2 will not lead to a reduction in safety. The aviation industry, for example, requires dynamic load tests like vibration tests, shocks and acceleration tests, as well as static load tests, environmental tests and flammability tests. These tests are necessary to fulfill the certification specifications like EASA CS-25 or FAA FAR-25. One basic test compendium for these tests is the RTCA DO-160. These tests are done to ensure, that the brackets are able to withstand any hazards during their lifetime (which is normally much longer than the one of the extinguishers) and that they are no threat to any other equipment or persons. Similar harsh requirements are valid for the rails and automotive industry, one example being the EN 61373 for European Rail Transports.

As a result of these requirements, the tested and qualified extinguishers can only be used with the brackets, they were tested with, including the UL- tests. This connection between extinguisher and bracket needs to be highlighted in the manual of the extinguisher, to reduce any risk of accidental usage of the wrong bracket.

Therefore, it should be possible, to order extinguishers and brackets separately, at least for commercial customers, as the different regulations (NFPA10, FAR 25, CS 25) already require the safe installation of the extinguisher, eliminating the danger of improper installation.

If clause 61.2 is amendment as proposed, amendments to clauses 19 and 72.1 would be necessary for clarification and to preserve consistency.

PROPOSAL

19.8 Only mounting devices tested in accordance with the Handle and Mounting Device Test, Clause 28, the Vibration Test, Clause 40 (marine applications), the applicable parts of the Aging Tests – Polymeric Materials (marine applications with polymeric parts), Clause 43 and the Salt Spray Corrosion Test, Clause 45 shall be eligible to be packaged with the extinguisher or listed within the extinguisher's documentation as usable with the extinguisher. See 61.2.

61.2 A bracket or mounting hook shall be packaged with each extinguisher.

Exception: An extinguisher weighing less than 1.4 kg (3 lb) and having a cylinder diameter of 75 mm (3 in) or less is not required to be supplied with either a mounting hook or bracket. Extinguishers are not required to be supplied with either a mounting hook or bracket, if:

- a) The extinguisher weighs less than 1.4 kg (3lb) and has a cylinder diameter of 75 mm (3in) or less, or
- b) The extinguisher manual provide a statement of the application and list of the intended bracket(s) to be used (see 19.8).