

Subject 73

June 22, 2018

SUMMARY OF TOPICS

The following changes in requirements to the Standard for Motor-Operated Appliances, UL 73, are being proposed:

1. Exception for "special purpose mercury based lamps"

STP BALLOTS AND ALL COMMENTS DUE: June 23, 2018

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 73, UL is looking for participants in the AHJ, Consumer, Government, Supply Chain, and Testing & Standards interest categories. 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 73 membership or are aware of potential candidates for this STP, please contact the STP Project Manager, Amy.K.Walker@ul.com@ul.com.

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

1. Exception for "special purpose mercury based lamps"

RATIONALE

Proposal submitted by: Kristian Swanson, Swanson Associates Inc

Requesting to have Clause 6.1 of UL 73 Ed.10 changed from "Not contain mercury" to "Not contain mercury, unless used within a fluorescent, high intensity discharge, or neon lamp bulb."

The product is a Large Industrial UV Digital Flatbed Printer, that utilizes UV mercury based lamps for curing the ink. Previous editions did not have this requirement of no mercury. As an example, I would think that this could be accepted in a UL 73 application, if the Standard was revised similar to UL 197.

Important Note: The requirements for "not contain mercury" is not only in UL 73. Doing a standards search, we found this same or similar clause in 47 UL Standards. Some of those standards actually have specific wording to allow mercury when used as part of a lamp for example in UL 197: "Not contain mercury, unless used within a fluorescent, high intensity discharge, or neon lamp bulb."

PROPOSAL

6.1.1 A component of a product covered by this standard shall:

- a) Comply with the requirements for that component as indicated in 6.2 – 6.26;
- b) Be used in accordance with its rating(s) established for the intended conditions of use;
- c) Be used within its established use limitations or conditions of acceptability;
- d) Additionally comply with the applicable requirements of this end product standard; and
- e) Not contain mercury, unless used within a fluorescent, high intensity discharge, or neon lamp bulb.

Exception No. 1: A component of a product covered by this standard is not required to comply with a specific component requirement that:

- a) Involves a feature or characteristic not required in the application of the component in the product,*
- b) Is superseded by a requirement in this end product standard, or*
- c) Is separately investigated when forming part of another component, provided the component is used within its established ratings and limitations.*

Exception No. 2: A component that complies with a UL component standard other than those specified in 6.2 – 6.26 is acceptable if the:

- a) Component also complies with the applicable component standard of 6.2 – 6.26; or*
- b) UL component standard:*
 - 1) Is compatible with the ampacity and overcurrent protection requirements in the National Electrical Code, NFPA 70, where applicable;*
 - 2) Considers long-term thermal properties of polymeric insulating materials in accordance with the Standard for Polymeric Materials – Long Term Property Evaluations, UL 746B, and*
 - 3) Any use limitations of the other component standard are identified and appropriately accommodated in the end use application. For example, a component used in a household application, but intended for industrial use and complying with the relevant component standard may assume user expertise not common in household applications.*

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