

**BUREAU OF HOME FURNISHINGS AND THERMAL INSULATION**

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TO: ADHESIVE MANUFACTURERS AND FOAM FABRICATORS

Technical Bulletin #117 was enacted into California law in October, 1975 as a small-scale flammability standard for concealed, resilient filling materials and upholstery fabrics used to construct upholstered furniture. Included in this standard is an open flame resistance test for polyurethane foam padding.

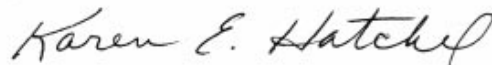
In recent years, there has been considerable uncertainty on the part of industry regarding Bureau testing of polyurethane foams laden with adhesives from foam fabrication processes and the possible enforcement consequences resulting from adhesive-laden polyurethane foam present in California furniture. Therefore, please be advised of Bureau policy in this regard:

- The Technical Bulletin 117 (TB 117) standard does not address the flammability performance of either pure adhesives or adhesive-laden polyurethane foam. In fact, no reference is made in the 117 standard to testing of adhesives, fasteners, or any other type of structural material. Only pure, resilient filling materials and fabrics, tested as distinct, single components, are subject to the standard.
- Given the fact that the TB 117 standard specifies tests on only pure polyurethane foams, it is impossible for an adhesive or other exempted component, to comply with this standard. Only a pure polyurethane foam or other type of filling material, can comply. Presence of an adhesive in tested foam specimens may have no effect or may tend to contribute negatively to compliance with the standard. Foam test specimens which are laden with adhesives and still pass Technical Bulletin 117 are considered complying foams.
- In cases where an adhesive-laden foam is found in an upholstered furniture product on the California market, the Bureau laboratory intentionally attempts to remove all traces of adhesives from foam specimens before testing. If it is not possible to remove all adhesive fragments without compromising specimen size, a statement is made in the test report regarding the presence of adhesive contamination on specific samples and any variances from the standard procedure are noted. If failure occurs, the Bureau then attempts to obtain pure (uncontaminated) exemplar foam of the identical type found in the product, from other sources, such as the furniture manufacturer or their supply dealer and conducts separate tests. If available, a foam of sufficient size to avoid the presence of adhesives is obtained and retested. Final results are based on the pure foam specimen, not the original adhesive-laden foam.

- The Bureau is judicious in its enforcement actions against upholstered furniture manufacturers and uses numerous factors in assessing the egregiousness of the 117 technical violation and its relationship to actual product consumer risk. These factors include the volume of polyurethane foam present in the furniture product, the ease of ignition of the foam and other potential combustibles, the ratio of foam volume to user size (adult vs. juvenile) and the number of units of violative product in the California market pipeline, as well as other important factors. The Bureau has never taken enforcement action against a furniture manufacturer for violation of Technical Bulletin 117 based on the presence of polyurethane foam laden with adhesives and does not anticipate doing so.
- Adhesives, if present in upholstered furniture, represent a very small portion of the total weight and volume of the construction materials and will not typically prevent or significantly contribute to the rapid or sustained burning of an actual furniture item, once ignited. Thus, use of adhesives in the construction of California furniture, especially juvenile furniture, is considered to be a much lower risk factor to consumers than the presence of non-fire retardant polyurethane foam. Death and injury rates in California and the United States involving upholstered furniture continue to remain unacceptably high and the construction of furniture with non-fire retardant polyurethane foam continues to be a significant contributing factor.

Hopefully, this document provides clarification needed for industry to pursue product development in response to environmental regulations without regarding Bureau of Home Furnishings and Thermal Insulation standards as an impediment.

Sincerely,



Karen E. Hatchel
Bureau Chief