UN Informal Meeting on Lithium Batteries - 2017-2018

1st Session, 27-29 March 2017 – Montreal, Canada

Day 1 – 27 March 2017

Introduction

- 1. Claude Pfauvadel (France) and Dr. Katherine Rooney welcomed participants to the ICAO Headquarters for the 1st session of the 2017-2018 Informal Working Group on Lithium Batteries (IWG) and presented the tentative agenda for the week. The Chairman explained the purpose of the meeting was to discuss the inherent hazards associated with lithium batteries. Based on lessons learned and experience gained, the UN Subcommittee issued a mandate to the IWG to consider a hazard-based system to classify lithium batteries and cells for transport. Such a system might include determining the inherent hazards represented by lithium batteries and the types of reaction that may result. Destructive testing should be considered. Overall questions to guide the discussions include:
 - a) Look at all available data that can already be useful to analyze the effects produced by lithium batteries when they react,
 - b) Identify the additional data needed,
 - c) Prepare plan for getting all the necessary data and the way to use them.
- 2. Presentations were distributed to the group prior to the meeting and are available from the PRBA Website: <u>http://www.prba.org/lithium-battery-transport-information/un-lithium-battery-working-group-on-classification/</u>
- 3. Day 1 consisted of presentations by INERIS and RECHARGE. Specific questions posed by the Chairman were also discussed on Day 1 and will be further discussed on Day 2.
- 4. The IWG discussed what would be reported to the UN Subcommittee and which questions were the most important to answer.
 - a) The Chairman explained the UN Subcommittee needs to know the feasibility of the mandate and what information is needed to meet the intended goals. The first session should not be expected to reach final decisions. Instead, the goal of the meeting is to determine the magnitude of the effort.
 - b) Specifically, the following questions were to be discussed:

1) What risk/type of reactions have to be assessed?

- a) fire
- b) gas emission
- c) toxic fumes
- d) projections

2) How to initiate the reaction in the test?

- a) exposure to fire (bonfire test)
- b) exposure to heat radiation
- c) exposure to heat through short circuit
- d) overcharge

3) What is the item to be tested for classification?

- a) a whole battery (independently from the size)
- b) a cell
- c) a "module" or battery part
- d) several of the above mentioned item
- e) can the reactivity of the bigger battery be assessed by testing some of the elements

4) Other issues

- a) testing packed or unpacked items (going toward a classification related to the transport packaging)
- b) use of the tests to define
- c) assessing the violence of the reaction only as a classification factor vs assessing the violence of the reaction and the sensitivity

INERIS Presentation

- 5. INERIS provided a summary of the testing they conducted on various types of lithium batteries. They reviewed the variety of effects that result from lithium battery incidents/fires and compared those effects by battery chemistry. They identified:
 - a) Toxic effects identified great variability between battery chemistries
 - b) Thermal effects identified great variability between battery chemistries
 - c) Mechanical effects not enough data to make significant comparisons
- 6. They also compared the effects noted above with other common materials including aerosols, DVDs, plastic drums, and a pallet of containerized salad (food).
 - a) Thermal effects They concluded that one battery pack tested represented a risk higher than a pallet of aerosols, while a second was on the same magnitude as a DVDs, plastic containers of salads, and plastic drums. The results indicated two clear groupings of thermal power levels; 1) above 140 megawatts (MW) and 2) below 70 MW.
 - b) Flame emittance and height results were similar to thermal effect tests.
 - c) Toxic effects reviewed concentration of gaseous effluents and compared the toxicity level in ppm. Lithium batteries presented a mid-level hazard compared to other materials. Plastic drums represented the highest toxicity, a magnitude greater than lithium batteries.
- 7. The results of the study indicated great variability on toxic and thermal effects between different battery types with many of the effects being lower than other commonly shipped goods. They concluded a classification system based on toxic and thermal effects would be relevant.
- 8. Participants discussed whether it was important to look at the specific hazards represented by the lithium batteries or whether those effects should be compared to other goods. Some suggested the unique properties of lithium batteries should be accepted as the basis and a system must address known concerns, regardless of how those values compared to other

materials. But the group recognized a first step must be to determine the different hazards represented and then determine risk-mitigation factors that may reduce or eliminate those hazards in a later step. A multi-modal approach must be considered. The group was reminded the efforts being conducted by the G-27 group reviewing lithium battery packaging by air. A presentation on the topic was scheduled for later in the session. The Chairman reminded the group the issue would not be solved during this meeting and would take more than one biennium to reach a final result. Hazards must be identified first, and tests defined to collect data. But it is also important to understand how identify representative samples (size, battery/cell chemistry, design).

9. Some indicated industry battery performance is governed by the intended use of the cell/battery and existing government regulations. Marketability and profitability are key drivers in industry. It is important to ensure new tests do not lead to unintended consequences (new designs to pass tests but hazards still exist).

RECHARGE Presentation #1

- 10. RECHARGE discussed the potential hazards of lithium batteries identifying:
 - a) Electrical
 - b) Thermal runaway
 - c) Chemical (electrolyte leakage)
 - d) Mechanical
- 11. In the case of thermal runaway:
 - a) Gas emission -toxicity and volume
 - b) Flame and heat emission
 - c) Rapid disassembly
 - d) Electrolyte leakage
- 12. RECHARGE explained thermal runaway is actually a series or chain of chemical reactions, several of which product heat and gas. The process is not a single reaction but several in a feedback loop. Event propagation occurs because of heat transfer, flames, and burning of flammable gas within the battery, casing, or high unit density in packaging. Cooling systems can dissipate heat across cells or out of the battery. Thermal insulation can also reduce heat transfer to other cells. They studied insulation properties with different materials (i.e. vermiculite, sand). They also reviewed event probability risk of battery resulting in a thermal event based on the status of the battery and battery design. Acknowledging the fact that a high severity of hazard would have a low acceptance in transport but a low severity hazard may have a higher acceptance, RECHARGE concluded a system can be developed to mitigate or eliminate severe hazards in transport while permitting lower hazards to exist if controlled.
- 13. The IWG discussed the difficulty in determining probability of an event. How is this determined in all cases? The group also considered the fact that various hazard properties can be mitigated in multiple ways. Participants were generally supportive of developing new classification criteria but had differing opinions on whether packaging or battery design needed to be considered as mitigating factors for classification. The Chairman and others felt strongly mitigating factors should be set aside for the short term and the group should focus on identifying intrinsic hazards, developing tests to identify relative hazards, and deal with mitigating factors at a future session.

RECHARGE Presentation #2

- 14. RECHARGE gave a second presentation discussing factors that may be used to categorize hazards. The approach included reviewing the maximum hazard (effect) produced by a battery and the susceptibility that a battery would present the maximum hazard. Propagation ability may be considered as one of the factors of susceptibility. They suggested a 3-step approach to classification:
 - a) Determination of maximum potential hazard effect
 - b) Characteristics of susceptibility
 - c) Consideration of mitigation factors.
- 15. Their proposal included concepts of testing for maximum potential hazard and susceptibility, and identification of relative hazard levels based on the hazard and susceptibility data. Once test data identified the relative hazard, mitigating factors could be used to reduce the hazard or susceptibility. The presentation gave a high overview of the philosophy of a new lithium battery classification system but did not detail the specific hazards that should be tested. RECHARGE concluded the presentation with a proposed scope of work for future work.
- 16. The IWG requested expansion on how susceptibility would be tested. Examples given included considering the temperature at which a battery may begin a thermal event, or whether cells would propagate within a battery. The Chairman suggested at present, the work discussed in the IWG would be in parallel and in addition to the UN38.3, but that changes to UN38.3 could be considered at a future session. The proposed scope of work was generally supported as a basis for moving forward.
- 17. The question was raised as to whether changes to the UN38.3 testing requirements could also be discussed. The Chairman explained the current mandate of the IWG does not include review of the UN38.3 requirements. Concerns about the existing UN38.3 may be considered as a separate work item. The work of the IWG may not be directly related to UN38.3, but the result of discussions may have consequences with UN38.3 and could be considered in the future. UN 38.3 is a pass/fail condition. If a design type passes, it is acceptable for transport as a Class 9. If it fails, it is not acceptable for general transport as a Class 9. The new method would consider the worst case situation and as a result, all cells and batteries would likely "fail" the test. Therefore, identifying the key factors to be monitored are more relevant in the new process versus UN38.3.
- 18. The Chairman suggested the group discuss the worst case condition, review the hazards that should be measured, and consider test methods that may be used to quantify the hazard. He reiterated all recommendations that come from the IWG must be discussed by the UN Subcommittee eventually. Therefore the work must be justified by data in the IWG.
- 19. The group questioned which hazards are not currently identified through testing under UN38.3. UN38.3 verifies the safety of the cell and battery design for transport, but the hazards are not quantified. The current test methods result in a wide range of reactions from very low dangers to very significant dangers. The new method should identify the reactions that are of concern, measure the reaction, and provide a method for relating the danger. Packaging should be considered after the hazards and test methods are established. Some participants questioned whether the efforts of the G-27 should be considered *in lieu* of complete changes to classification. They voiced concern that as hazards of lithium

batteries are identified in the IWG, the group as a whole will consider all hazards as "worst case" and must be mitigated, when in reality hazardous effects may already be confined to the package or through battery design under the current system. Others explained the current system is not capable of applying to new technologies, and based on information from modal bodies, does not contain enough granularity to allow for proper characterization of relative danger. Therefore new processes need to be considered. While the air mode has been the most vocal for change and raised the issue because all hazards represented by lithium batteries are not fully identified under the current system, the current system presents problems in all modes. Once the IWG has decided on a course of action and it is endorsed by the Subcommittee, the Modal bodies may consider how they will address the hazards through packaging, hazard communication, or exceptions.

20. The Chairman summarized the discussion on Day 1, indicated the group will review the FAA information in the morning, and will review and answer the questions from the Agenda during the remainder of the day. The IWG discussed the importance of defining the hazards and identifying acceptable criteria for each of the hazards before moving to testing and mitigation taking into account the possibility of future technologies. The Chairman agreed and indicated the system should be independent of technology.

End of Day 1

Day 2 – 28 March 2017

FAA Presentation

- 21. The FAA gave an overview of lithium battery testing they have conducted at the FAA Fire Safety Branch in Atlantic City, New Jersey, USA. In Report TC-16/37, Primary tests were to determine if Halon or existing packaging prevent propagation of thermal runaway in Class C cargo compartments. Results indicated existing packaging does not prevent cell to cell propagation, and Halon was inefficient in extinguishing lithium ion fires completely. In these tests the FAA demonstrated that propagation of thermal runaway did not occur for the majority of cells tested when the SOC was reduced to 30%.
- 22. Other reports issued include TC-TN 16/22 and TC-16/17 which determined thermal heat production and cell failure effects.
- 23. Some members questioned why the aviation industry uses Halon as an extinguishing agent. The FAA explained alternate solutions are being researched but have not been adopted yet. The group questioned whether there was a clear relationship between the energy released in a thermal runaway vs. the stored electrical energy. The FAA noted their testing confirmed more energy was released in the thermal runaway than the total energy stored electrically in the battery.
- 24. All three reports are available from the FAA Testing Center Website:
 - a) Report DOT/FAA/TC-16/37 titled: Summary of FAA Studies Related to the Hazards Produced by Lithium Cells in Thermal Runaway in Aircraft Cargo Compartments, (July 2016), is a compilation of test data and results from projects conducted by the Fire Safety branch over the past 15 years.
 - i. <u>https://www.fire.tc.faa.gov/pdf/TC-16-37.pdf</u>

- b) Report DOT/FAA/TC-16/17 titled: Fire Hazard Analysis for Various Lithium Batteries, (March 2017), is a report of fire test conducted on lithium ion cells (pouch, cylindrical) and lithium metal cells (cylindrical) of various cathode chemistries and sizes to evaluate their failure effects.
 - i. <u>https://www.fire.tc.faa.gov/pdf/TC-16-17.pdf</u>
- c) Technical Note DOT/FAA/TC-TN16/22 titled: Energy Release by Rechargeable Lithium-Ion Batteries in Thermal Runaway (April 2016), and its publication: Richard E. Lyon, Richard N. Walters. "Energetics of lithium ion battery failure." Journal of Hazardous Materials 318 (2016) 164-172. It is on the energy released by failure of rechargeable 18650 cylindrical lithium ion cells/batteries measured in a bomb calorimeter for four different commercial cathode chemistries over the full range of charge using a method developed for this purpose.
 - i. <u>https://www.fire.tc.faa.gov/pdf/TC-TN16-22.pdf</u>
 - ii. http://www.sciencedirect.com/science/article/pii/S0304389416306008
- d) Additional information, videos and data are available from the FAA Test Center website. <u>www.fire.tc.faa.gov</u>.

SAE G-27 Presentation

- 25. General Motors provided an updated on the ongoing effort within the SAE G-27 to develop a minimum performance standard for packaging used to ship lithium batteries by air. Two concerns directed the effort:
 - a) Uncontrolled fire in Cargo Compartment
 - b) Critical Overpressure in cargo compartment
- 26. The group continues to develop test methods to determine if packaging will ensure that hazardous effects are limited to the package (i.e. no flame emitted, no projection hazards, no ignition of vapors, maximum external package, and package integrity). G-27 is also considering a test that would indicate the cell is completely safe. Current draft testing methods were discussed.
- 27. Participants discussed the concerns over the vapor or gases that are produced from thermal runway events. The testing currently does not distinguish between vapor or gas production. They indicated there are multiple ways of failure including ejection of a cell for flame from the package. SOC is also being considered requiring testing at 110% of the SOC as offered for transport. The group questioned whether heat-absorbing or dissipating materials were being reviewed in the effort. Others explained that the packaging industry is actively developing new packaging, and some of those designs include heat dissipating materials.
- 28. Concerns were voiced on how the G-27 results would be integrated into the regulations and implemented into industry. The result may be very complicated and could lead to shipper confusion as to which packagings were tested and approved for which types of batteries. The group was reminded the G-27 effort is to test packaging designed to contain a battery, whereas the IWG is looking at how to classify the relative dangers presented by lithium batteries. The IWG discussed the fact that test methods being considered start with a failure of a cell that then propagates, not necessarily heating or causing an entire battery to start the event. Can tests be developed to use short circuits as the event initiator? The discussion concluded with the indication that the G-27 WG plans to complete the standard in late 2017.

Hazardous Effects Brainstorming

29. The IWG conducted an open, brainstorming event to collect and discuss hazardous effects that should be considered as part of the classification process. The Hazard Table (See Annex) lists identified hazards, reasons for concern, parameters to be measured, and general notes on the issue.

<u>Action</u>

30. The IWG recommended participants continue to obtain and submit information on open questions to determine appropriate tests associated with different hazard categories.

Initiation discussion

- 31. The IWG discussed the challenges with initiating the reaction. Using an external short-circuit approach to define conditions that would lead to a worst-case thermal runaway reaction would be very difficult. The current short circuit in UN38.3 would not give the intended worst-case result. The short circuit test is a misuse condition and does not reach the goal of a destructive test. Others felt a reaction was needed in all cases, and short circuit may not be readily reproducible. A bonfire test may be too severe but a flame source could be used (flammable liquid fire, etc.). Heat appears to be more reproducible than short circuit. Some felt cells and batteries may have different initiation solutions. The probability of more than 1 cell having a reaction is far greater than 2 or more. Thus, it was suggested perhaps only 1 cell reaction in a battery needed to be simulated.
- 32. The IWG agreed the test procedure should ensure that thermal runaway or thermal reaction is certain. Electrical initiations are not certain. The test investigations should study whether the reactions are different with different initiation methods (fire, radiant heat, electrical). The amount of energy released during an event should be compared to the amount of energy used to initiate the reaction. Since some test methods are more stressful than other test methods, screening tests could be considered. Some participants felt it important for tests to be flexible to accommodate various designs and chemistries. It was noted the G-27 Group discussed the same issue and came to the conclusion that a heating cartridge was the preferred method. The Chairman reminded the mandate from the Subcommittee was to determine the hazards presented by lithium batteries and identify possible tests to measure the severity of the hazards. Tests must be meaningful or practical in reality. Such tests would then become the basis for classification of lithium batteries in the future. Therefore, understanding the difference between reactions initiated by different methods will impact how the tests are designed. Participants discussed the fact that every cell and battery represents both chemical and electrical hazards, but electrical initiation methods are more difficult to impose. Some participants confirmed from experience that pressure, heat, gas composition, and reaction vary greatly depending on initiation method.
- 33. Some felt propagation is of critical concern, and therefore the initiation method for the first cell may not be as critical as long as thermal runaway begins. If a cell is resistant to heating and thermal runaway, the cell becomes a safer cell. But it is also important to design a test that represents real life initiation methods.
- 34. The Chairman summarized the discussion by indicating the question of how the different initiation methods impact the results. Research can be done through review of literature and

existing test methods. If the data suggests a difference exists, additional investigative tests can be conducted. If the data confirms some methods create bias, the eventual test methods can be adjusted to address the bias.

End of Day 2

Day 3 – 29 March 2017

Discussion on What Needs to be Tested

- 35. The IWG began Day 3 by discussing what should be tested (the cell, the battery, modules, several of each). Participants shared opinions that the reaction on the cell level is the critical element. Opinions were divided whether the test results on the battery would be equivalent to those conducted on the cells alone. . After some discussion, it was generally agreed that it would be dependent on the hazard to be assessed and the nature of the abuse and the design of the battery. But if disassembly occurs or heat generation occurs, batteries composed of such cells may also need to be tested. If testing of batteries becomes independent, cost associated with testing may become unreasonable. The IWG debated whether a package containing 1000 cells is equivalent to a battery containing 1000 cells. Some recommended conducting "investigative" tests to determine if a battery made of benign cells will result in a benign battery (does the reactivity of cells equate to the reactivity of the battery). The group acknowledged there may be situations where reactive cells may be protected in a battery case or pack. Several participants felt any testing scheme should include considerations for scaling up or scaling down testing based on cell/battery design and protections. Others pointed out heat generation in a battery pack independent of cells may lead to the thermal events. Large batteries containing benign cells will have additional considerations including high voltage that may overpower any safety systems present. The presence of plastics or other materials in the pack/case may create smoke, vapor, etc.
- 36. The Chairman added experience with the current UN38.3 testing indicates there are conditions that the battery will experience that could lead to a thermal event that are not addressed when testing the cell alone. Some pointed out the definition of "benign" is critical in this argument. A cell may not experience a thermal event but if it creates enough heat or leaks, it might create other hazards already seen in incidents. Others argued even benign cells could be placed into a battery in a "less safe" design. Thus, the battery or pack should have some testing requirements. One participant suggested to compare the situation with exceptions for limited quantities for other dangerous goods to lithium cells and batteries. By limiting the amount of material per package, exceptions can be given for hazard communication and packaging. Additional requirements are added for vessel or air, but the situation was not exactly the same when cells are connected together in batteries to create a new article, which is not the case with inner packages contained in an outer packaging.
- 37. Participants added testing should consider whether cells will push electrical charge to cells that are beginning to enter a thermal runaway. This also raises the question as to whether cells in parallel each at a 30% SOC should be considered a single cell at 60% SOC. Others confirmed their experience supported this concern.

38. The IWG recommended participants share testing experience between benign cells and battery packs. Additionally, the group considered including such testing in an investigative testing plan. Some noted emergency responders will have a different perspective on the issue and recommended they be invited to participant in the discussion.

Investigative Test Plan

<u>Action</u>

39. Based on the discussion, the Chairman indicated France would prepare an Informal Paper for the July Session of the UN Subcommittee recommending an investigative testing plan to answer some of the questions raised during the week.

<u>Action</u>

- 40. The Chairman noted France will ask for a Lunchtime Working Group at the July Session. Discussion topics for the session would include:
 - a) Tests to be conducted
 - b) What would be a satisfactory representative sampling
 - c) Who would be able to participate in the investigative testing
 - d) Ensuring confidentiality when necessary and appropriate.
- 41. Opinions were given that battery chemistry may have a significant impact on testing results. Therefore, concepts of equivalency must be considered. PRBA indicated they would work with BAJ and other battery associations around the world to bring additional resources to the testing efforts. It was reiterated that confidentiality will be an important aspect of the testing to ensure participation will not be limited.
- 42. The Chairman noted the representative of RECHARGE offered to host the next session of the IWG in Europe. The date and location will be decided after the July session of the UN Subcommittee.

Conclusion

43. The Subcommittee is invited to take note of the discussions in the report and the questions raised in the Table in the Annex, and action as appropriate including development of revised terms of reference for future work.

End of Day 3

Annex

Hazard Table

Hazards	Characteristic	Measurable parameter	Concern	What needs to be investigated?	How do we investigate/ intitiate it? [is a precise measurement tool needed?]	Notes/Questions
Thermal		Flame duration	flame may lead to fire in package, CTU or cargo compartment/ all of the other hazards	range/duration/ temp of flame		
	Fire	Flame power	Heat energy			IWG suggested removing this condition
		Flame length/height				
	Heat Production	Heat release rate	heat may initiate fire or reaction with other LB	heat energy available		
		Max energy released	evolution of heat flow rate over time and duration	max energy (MW/kg), how long it lasts (sec)	heat flow meter in given distance	
		Max temp increase	temperature at surface or from a distance, or temperature of gaseous emissions	what is the heat produced by the battery? What is the heat production of combustibles in the battery? Is the presence of O2 a limiting factor?	IR camera	

Hazards	Characteristic	Measurable parameter	Concern	What needs to be investigated?	How do we investigate/ intitiate it? [is a precise measurement tool needed?]	Notes/Questions
Gas Emission	Gas production (std pres. Temp)		gas generation may influence transport atmosphere	volume and speed of gas generated created during thermal event	determine which gases are of concern/possible in reaction (i.e. HF difficult to measure), influence of burning of gases to concentration, availability of O2 to reaction, sensitivity to test conditions (internal and external), does distance influence the result?	
	Toxicity		toxic gases may create a toxic atmosphere to humans	composition, concentration, duration of exposure		
	Flammability		flammable gases may create an ignitable atmosphere	composition, concentration, ability to ignite		
	Corrosivity		corrosive gases may create a corrosive atmosphere to packaging, CTU, and transport vehicle. Should we consider corrosivity as a threat to human health?	composition, concentration, corrosive nature		to concentration, availability of O2 to reaction, sensitivity to test conditions (internal and external), does distance influence the result?
	1	1				

Opacity meters, light source, Should be investigated to	Hazards	Characteristic	Measurable parameter	Concern	What needs to be investigated?	How do we investigate/ intitiate it? [is a precise measurement tool needed?]	Notes/Questions
Smoke/vapor Smoke/fog/opacity reduction in visibility opacity of vapor or gas generated what volume should be considered? determine if it a real threat whether it is a distinguishing characteristic for classific	Smoke/vapor	Smoke/fog/opacity		reduction in visibility	opacity of vapor or gas generated	Opacity meters, light source, what volume should be considered?	Should be investigated to determine if it a real threat and whether it is a distinguishible characteristic for classification.

Hazards	Characteristic	Measurable parameter	Concern	What needs to be investigated?	How do we investigate/ intitiate it? [is a precise measurement tool needed?]	Notes/Questions
	Explosion/projection		expulsion of materials or complete failure of the cell/battery casing	weight and distance of parts ejected		May already be addressed in UN38.3, other UN test series, or industry standards. evaluate for inclusion or expansion, significance
Mechanical	Pressure pulse		immediate release of gas or combusion of gas creates pressure pulse that may damage seals, packaging, vehicle	Quantity of gas, concentration of combustible gases, volume of packaging, CTU, cargo compartments	measure rate of gas release from sealed cell/battery or packaging, pressure released from combusion of gases	1-2 psi pressure pulse can create issues in air transport, determine if it is an issue in other modes, different battery chemistries
	Leakage		release of electrolyte	Assessment of hazard depending on nature of the characteristic of the electrolyte and the quantity (flammable, corrosive, toxic electrolyte)	disassembly leads to release of electrolyte	May already be addressed in UN38.3. evaluate for inclusion

Hazards	Characteristic	Measurable parameter	Concern	What needs to be investigated?	How do we investigate/ intitiate it? [is a precise measurement tool needed?]	Notes/Questions
Chemical	Toxicity		toxic substances may create a toxic effects to humans	composition, concentration, duration of exposure	- be c	Might not be separate as it may be covered by leakage
	Flammability		flammable liquids may create an ignitable atmosphere	composition, concentration, ability to ignite		

Hazards	Characteristic	Measurable parameter	Concern	What needs to be investigated?	How do we investigate/ intitiate it? [is a precise measurement tool needed?]	Notes/Questions
Electrical	Total energy in system		energy in the system may lead to event initiation,	Determine how energy level impacts initiation and level of reaction		Related to initiation of reactions, SOC for testing conditions. Relation to energy level and reaction may be investigated. Not a separate hazard
	High voltage		Impact of high voltage on reaction, possible ignition of flammable gases or adverse interaction with fire extinguishing materials.	Determine if high voltage creates additional hazards		Electro-shock hazards are addressed by other standards and are not covered in this test parameter.