



THE INFLUENCE OF REGULATIONS ON MATERIAL DEVELOPMENT

8th Triennial International Fire & Cabin Safety Conference

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A decorative graphic at the bottom of the slide features two overlapping, wavy lines. The top line is orange and the bottom line is blue, both curving from left to right across the bottom of the page.

CHEMISTRY THAT MATTERS™

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- Regulations as a beginning
- From regulations to specifications
- When regulations change
 - 4 types of change
- The Vertical Flame Propagation (VFP) test
- Reaction-to-fire properties and fire test metrics
- Summary

SABIC BY THE NUMBERS

1976, our beginning
40 years of growth

3rd largest global diversified chemical company*
116th largest public company in the world*

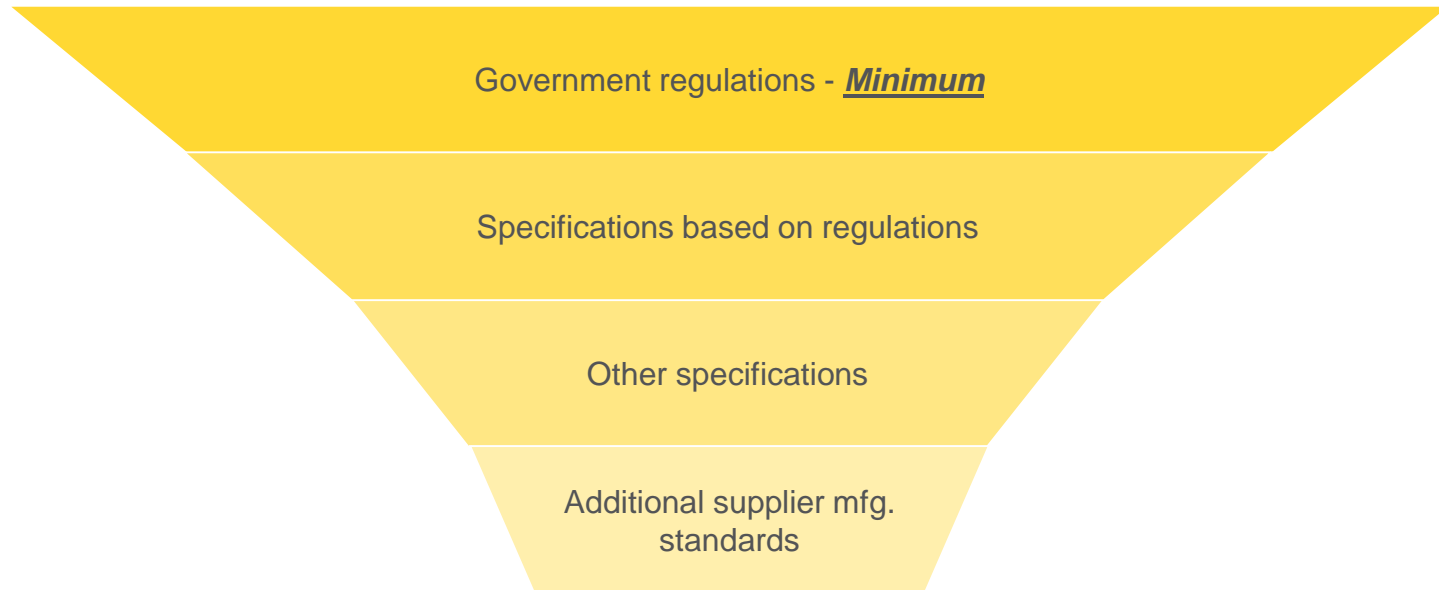
87.53 B\$ total assets
39.49 B\$ annual revenue
5 B\$ net income

40,000 employees
50 countries
5 Strategic Business Units

64 world-class plants worldwide
5 key geographies with innovation hubs
150 new products each year
10,960 global patent filings



REGULATIONS ARE JUST A BEGINNING

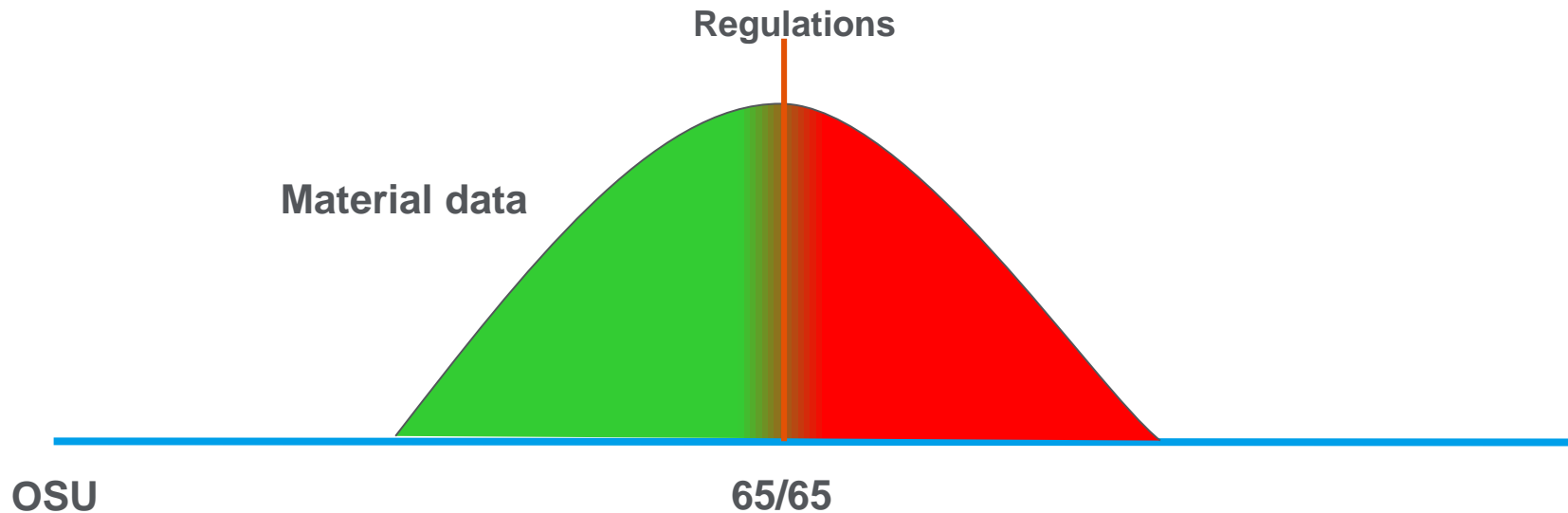


➤ Regulatory requirements, by their nature, tend to be a starting point in material development. Other requirements tend to narrow options further.

REGULATIONS AND MATERIAL DEVELOPMENT

FROM REGULATIONS TO SPECIFICATIONS

REGULATIONS ARE JUST A BEGINNING



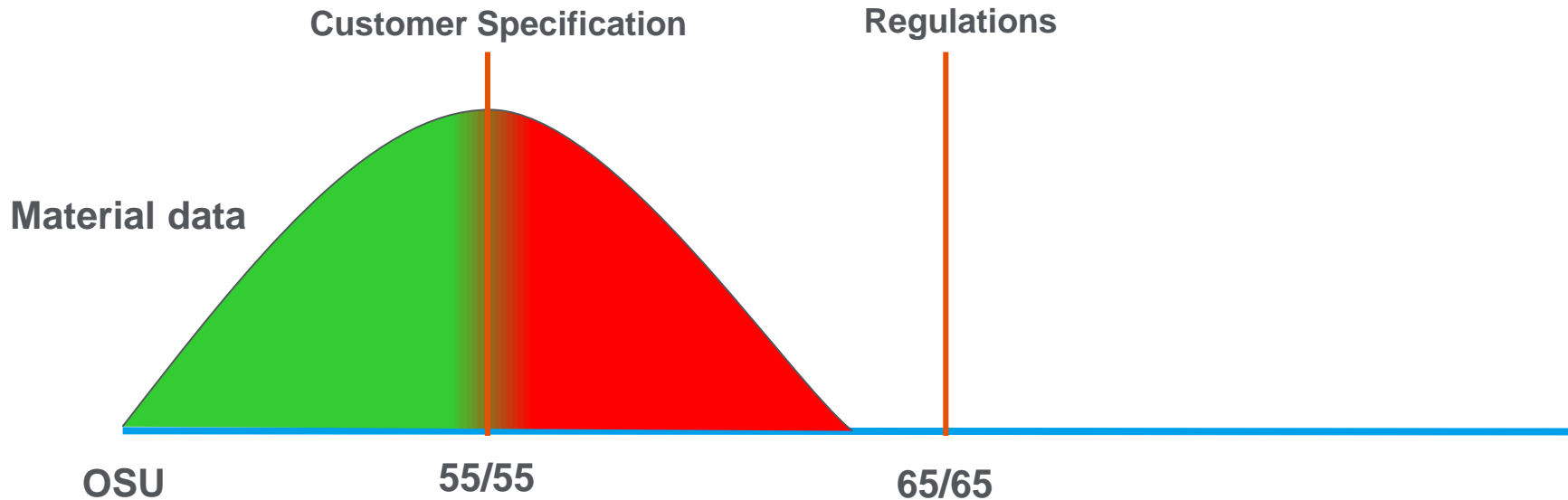
Since failing lots are unusable:

- Lot-to-lot testing eliminates half of the material?
- What to do about the “blurry” middle (ex: 1 outlier pushes average into either passing or failing)
- What if intra-lot variability plus the testing variability causes this testing distribution *within* a lot?



Not an ideal situation.

SPECIFICATIONS – THE “HIDDEN” REGULATIONS



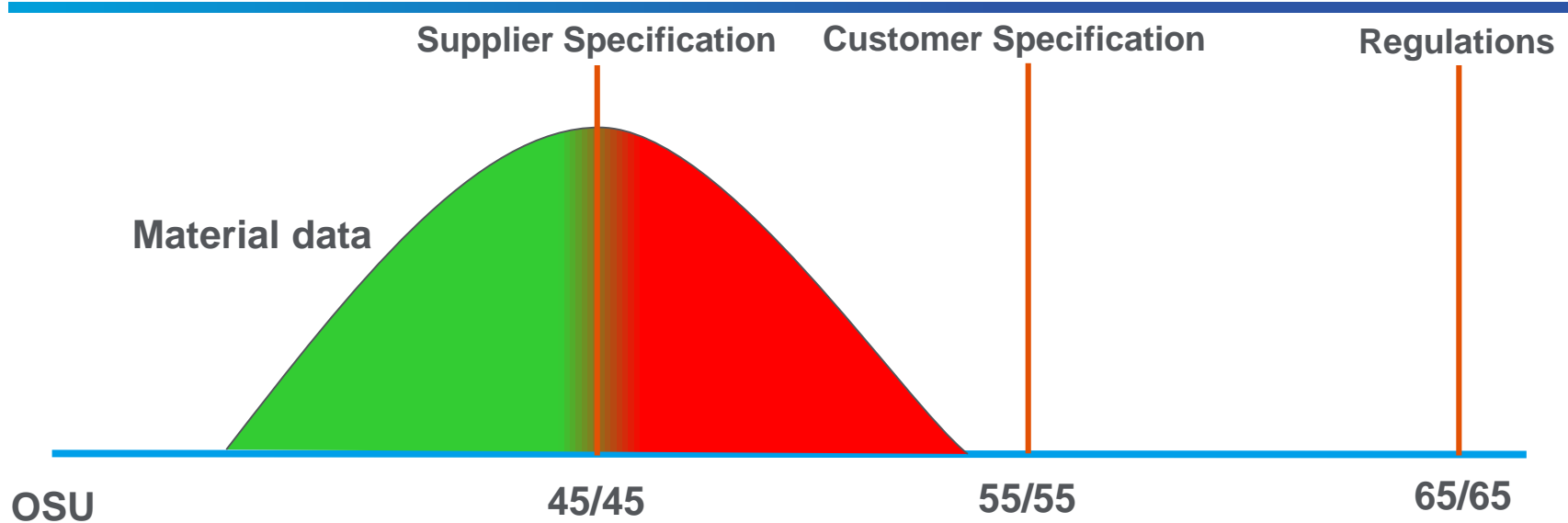
Failing a specification is not necessarily as consequential as failing the regulation, but:

- Failing lot could be rejected
- There is still the “blurry” middle
- If material is part of a composite in end-use, a “small” specification failure could result in a composite regulatory failure



Even with added the safety, designing to a customer specification has risks

SUPPLIERS CAN ADD ADDITIONAL SAFETY FACTOR



Now:

- A material that fails an internal supplier specification still could meet customer specifications
- Chances of a material failing the regulations become very remote
- There really is no “blurry” middle



One of the best situations when meeting/exceeding regulations is ultimate goal

REGULATIONS AND MATERIAL DEVELOPMENT

WHEN REGULATIONS ARE CHANGING

WHEN REGULATIONS CHANGE

Nature of change is critical:

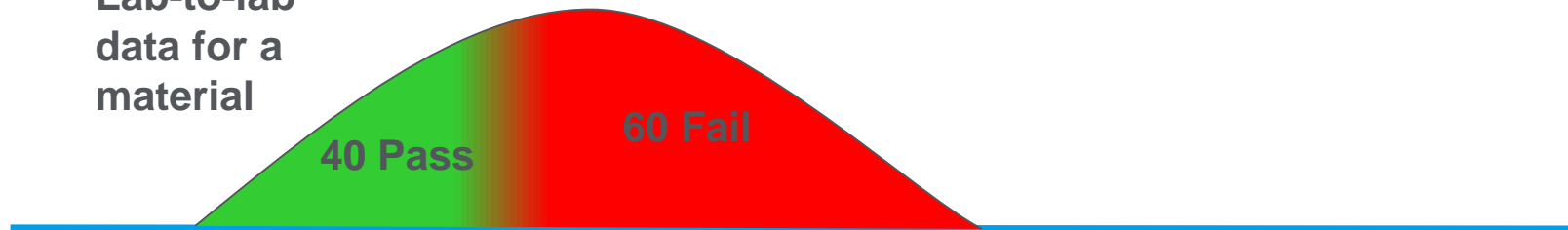
- Case 1: Decrease variability within an existing test... including lab-to-lab variability
- Will an accredited lab become more severe as a result?
 - Was a material depending on such a lab for data?
- Case 2: Increase requirements of existing test, or add an existing (known) test
- Will current product meet the increase/added test?
 - Can current product be “changed” to meet the increase/added test?
 - Will a new product be needed?
- Case 3: New test is being developed and added to the regulations.
- Where and when to focus?
- Case 4: Decreasing requirements of existing tests
- Being discussed as potentially part of new rule (vertical burn tests & smoke)
 - Existing applications may see a decline in small scale fire performance



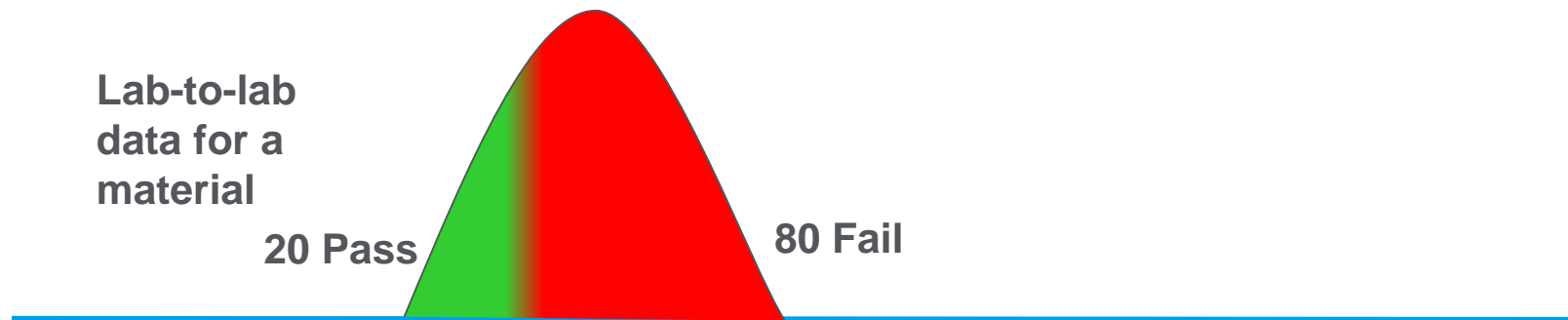
Be aware of underestimating the impact of a change

CASE 1: DECREASING LAB-TO-LAB VARIABILITY

Lab-to-lab
data for a
material



Lab-to-lab
data for a
material

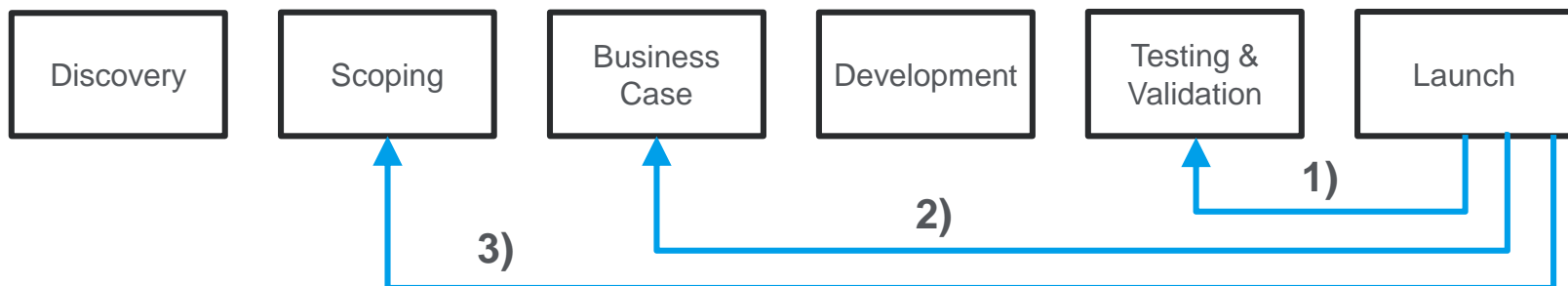


Unintended consequences, which may have no “solution,” except product development

CASE 2: INCREASE REQUIREMENTS / ADD AN EXISTING TEST

- 1) Will current product meet the increase / added test?
- 2) Can current product be modified to meet the increase/added test?
- 3) Will a new product be needed?

Product development in a Phase-gate** Process



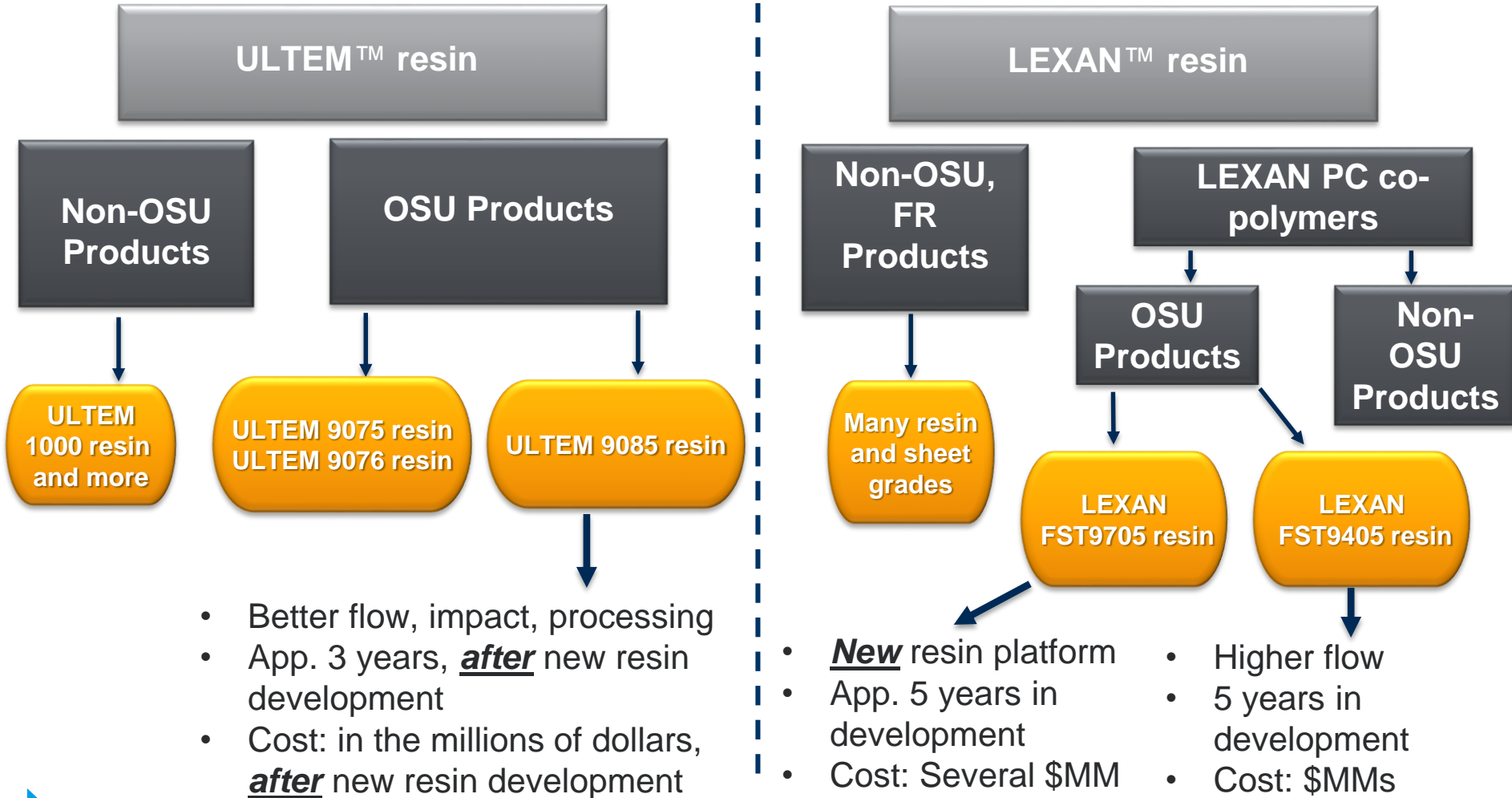
Even for simplest route:

- How many lots need to be tested?
- Is underlying distribution acceptable for internal specifications, customer specifications, and ultimately regulations?
- Will specifications need to be changed?



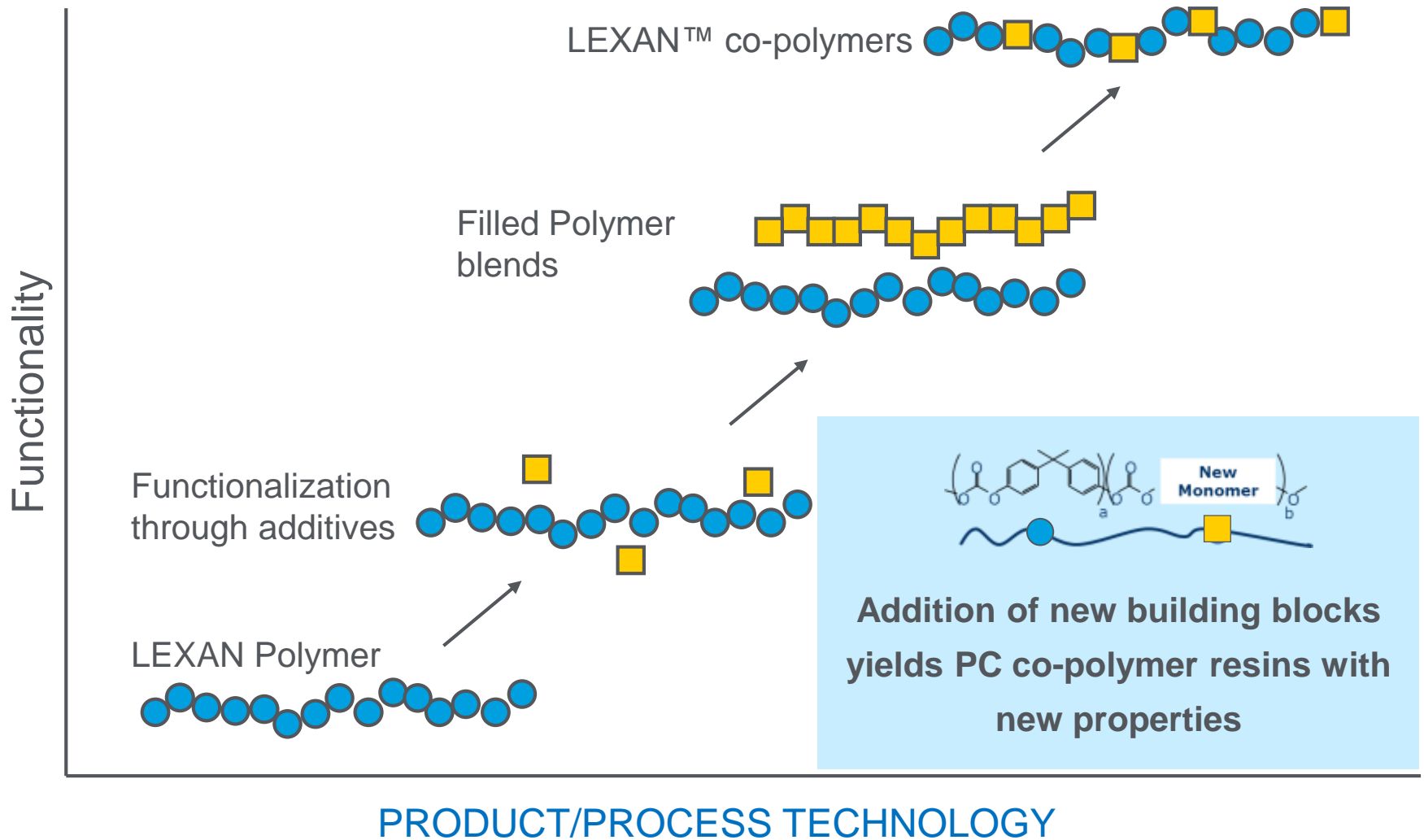
Product changes bring much more uncertainty, time, and development costs

AIRCRAFT PRODUCTS IN LARGER PORTFOLIOS



“Similar” products in a portfolio can vary widely in developmental complexity & cost

NEW TECHNOLOGIES



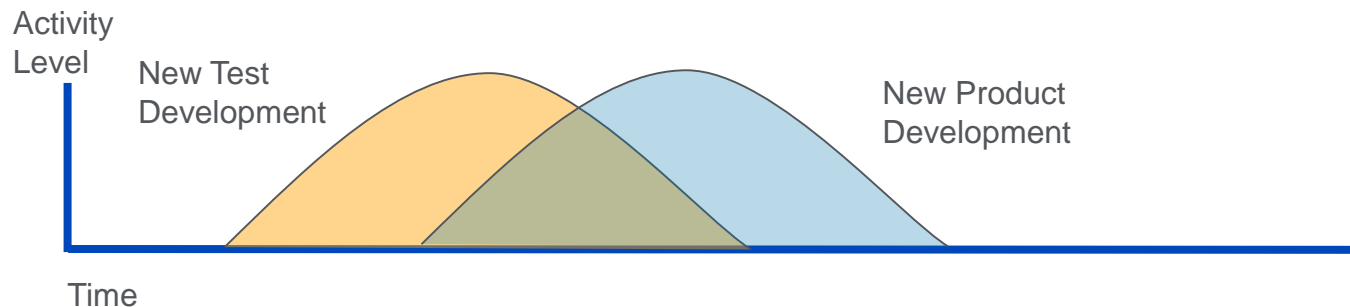
CASE 3: DEVELOPMENT OF NEW REGULATORY TEST

Material developers using a Phase-gate** process:



- May spend a lot of time in these gates
- Large scale concerns and tests become intermediate tests
- Intermediate tests become lab-scale

- Test of existing materials?
- Product development necessary?
- Invention needed?
- Timing of regulations



➤ In this case, product development generally lags new test development

CASE 4: DECREASING REQUIREMENTS OF EXISTING TESTS

Example: Two currently commercialized aircraft grade SABIC materials

		12 second vertical BB			60 second vertical BB		
Product (both 0.080")		Avg. burn length (in.)	Avg. burn time (sec.)	Longest burning particle (sec)	Avg. burn length (in.)	Avg. burn time (sec.)	Longest burning particle (sec)
Current criteria: 1 = 12 sec. VBB 2 = 60 sec. VBB	1	0.7	5.1	N/A	4.6	55.2	10.0
	2	0.8	0.3	N/A	3.4	3.3	2.5
Potential criteria**: 1 & 2 = 60 sec. VBB	1	0.7	5.1	N/A	4.6	55.2	10.0
	2	0.8	0.3	N/A	3.4	3.3	2.5

** Discussed as potentially part of the new rule.

➤ Under the potential criteria, as customers purchase a different product mix, aircraft components could see a reduction in small-scale fire performance

REGULATIONS AND MATERIAL DEVELOPMENT

EXAMPLE:

VERTICAL FLAME

PROPAGATION (VFP) TEST

VFP – BRIEF HISTORY OF A NEW, PROPOSED TEST

Development

- Initial intended use: composites (skins, structural elements) in hidden spaces
- Meant to be more severe than current 12 second vertical burn test
- Large scale data, reduced to intermediate test, reduced to lab-scale test
- Lab scale test and metrics designed around composite reaction-to-fire

Problem

- Scope changed to potentially include any “large” material in hidden spaces
- With first thermoplastic tested, a problem was discovered... invalid results

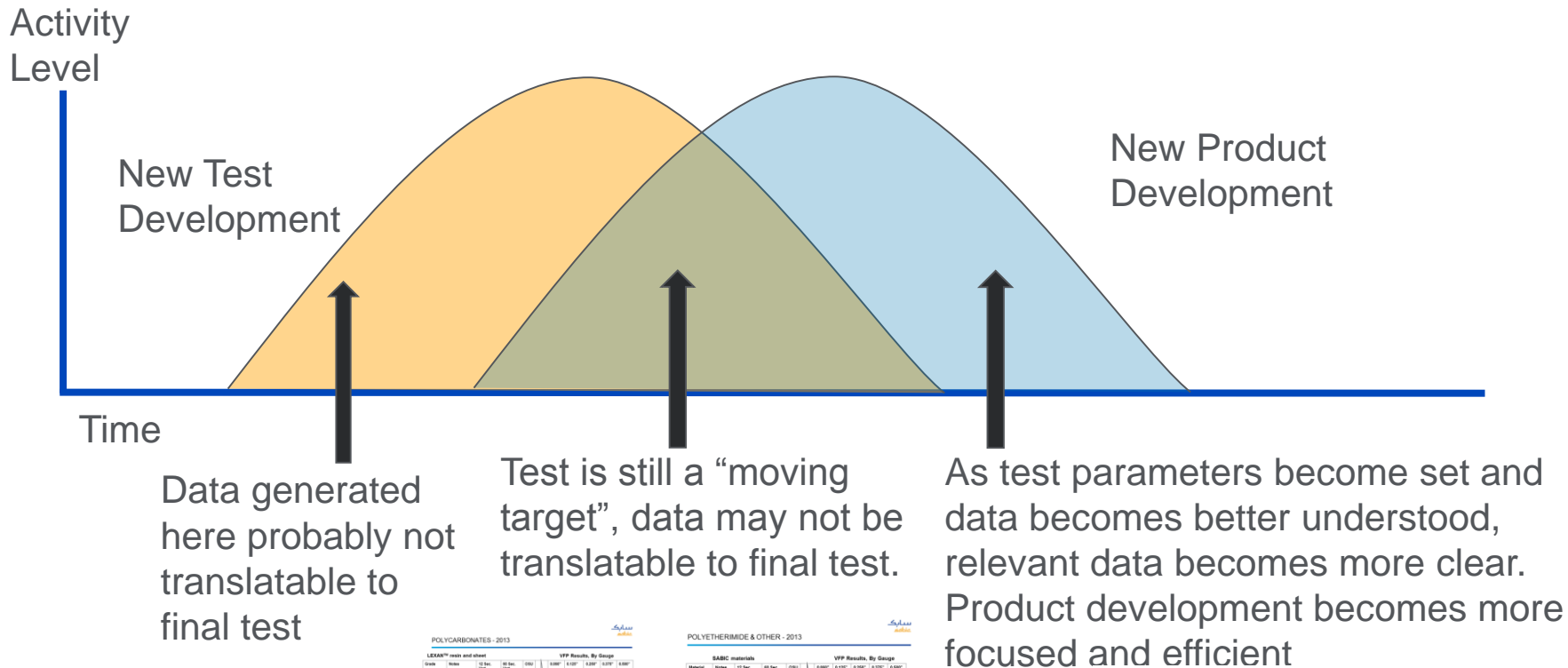
Problem resolution

- More product testing – find extent of problem
- Various proposed “fixes”
- Settled on changes to the equipment, which leads to more tests.



A change in scope could change stakeholders, products covered, and test fundamentals

VFP CYCLE FROM PRODUCT DEVELOPMENT VIEWPOINT



Data generated here probably not translatable to final test

Test is still a “moving target”, data may not be translatable to final test.

As test parameters become set and data becomes better understood, relevant data becomes more clear. Product development becomes more focused and efficient

POLYCARBONATES - 2013

LEXAN™ resin and sheet

Grade	Notes	12 Sec. V0	60 Sec. V0	OSU	0.500"	0.125"	0.250"	0.500"
9000	Non-FR, Clear	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	FR, clear	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	FR, anti-drip	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	FR, OSU	Pass	Pass	Pass	Pass	Pass	Pass	Pass

Legend:
■ - Fail
■ - Pass
■ - Assume pass, based on the other relevant results
■ - Invalid Results
■ - Assume invalid results, based on the other relevant results
■ - Unclear - not enough relevant data

POLYETHERIMIDE & OTHER - 2013

SABIC materials

Material	Notes	12 Sec. V0	60 Sec. V0	OSU	0.500"	0.125"	0.250"	0.500"
UL 94V-0	Clear	Pass	Pass	Pass	Pass	Pass	Pass	Pass
UL 94V-0	OSU	Pass	Pass	Pass	Pass	Pass	Pass	Pass
PC/ABS 101	FR	Pass	Pass	Pass	Pass	Pass	Pass	Pass
PC/ABS 101	FR	Pass	Pass	Pass	Pass	Pass	Pass	Pass

Legend:
■ - Pass
■ - Assume pass, based on the other results
■ - Unclear - No relevant data

POLYCARBONATES - FEB 2015

LEXAN™ resin and sheet

Grade	Notes	12 Sec. V0	60 Sec. V0	OSU	0.500"	0.125"	0.250"	0.500"
9000	Non-FR, Clear	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	FR, clear	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	FR, anti-drip	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	FR, weight reduced	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	Clear OSU	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	OSU	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	Light	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	OSU 100/100	Pass	Pass	Pass	Pass	Pass	Pass	Pass
9000	OSU 100/100	Pass	Pass	Pass	Pass	Pass	Pass	Pass

Legend:
■ - Fail
■ - Pass
■ - Assume pass, based on other relevant results
■ - Invalid Results
■ - Unclear - not enough relevant data
■ - Not designated by SABIC
■ - Nearly invalid due to insufficient product
■ - Assume invalid results, based on the other relevant results

➤ For thermoplastics, hidden assumptions in fire tests are critical to uncover

REGULATIONS AND MATERIAL DEVELOPMENT

REACTION-TO-FIRE PROPERTIES AND FIRE TEST METRICS

MATERIAL REGULATORY REQUIREMENTS = FAA FIRE TESTS

Thermoplastics

- By definition: shaped by heat. Can “melt”, soften, flow. All could be reaction-to-fire behaviors under direct flame and/or radiant heat.
- Some will not “puddle” in fire tests, but may drip small or large pieces.
- Some will not drip at all in the FAA’s OSU, vertical burn, or smoke tests.
- In general, higher heat, better “FR” materials, will soften and drip much sooner than they will burn. Will vary depending upon fire conditions and material.

Good or bad reaction-to-fire behavior?

- Fire risk scenarios dictate which behaviors are desirable or not.

Specific materials may have a “surprise”, but known reactions-to-fire should not

- Aircraft interiors have used plastics for several decades.
- High intumescent materials are not new & are used in many industries, including aircraft.
- High end composites, with “popping” and “spalling”, are also known



FAA tests need to account for foreseeable reaction-to-fire properties in any new or modified test meant for multiple materials

NEW TECHNOLOGIES & INTUMESCING FIRE PERFORMANCE

STD. FR POLYCARBONATE OR FR PC/ABS:

- Loose & unstable char,
- Fails OSU & Smoke Density (PC/ABS)



MINERAL FILLED FR PC/ABS:

- More stable char formation,
- Improved HRR & Smoke density
- OSU is still difficult to pass



LEXAN™ CO-POLYMERS :

- Stable and compact char formation
- Specific grades have low OSU and smoke numbers (comfortably passing FAA requirements)

SUMMARY – PRODUCT DEVELOPMENT AND REGULATIONS

- Regulations are a “beginning” for safety
- Customer specifications can be just as important for product development
- No change in fire-test regulations should be seen as minor, without thorough investigation
- Where possible, material suppliers need to be involved in fire test development
- Unless a test is specific to a material (e.g., magnesium alloys), a fire test needs to account for all foreseeable reaction-to-fire behaviors

**Thank you for
attending.**

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