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Industrial Machinery Standards:

NFPA 79 for the US in comparison to IEC / EN 60204-1 for Europe (2016 Edition)



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Introduction

Every year, European manufacturers export thousands of electrical products to the US. Sometimes these products are unwittingly non-compliant simply because European manufacturers are unfamiliar with the equipment rules that apply in the individual US states, or that are required by specific Authorities Having Jurisdiction (AHJs) and the Occupational Safety and Health Administration (OSHA).

Building a compliance programme that accommodates the wide variety of requirements from different US institutions is complex and sometimes confusing. A manufacturer's lack of understanding of local and national US laws and their implementation can lead to some requirements being overlooked which can delay product entry at port – eating into the sales calendar. A simple non-compliance that could have been resolved with a design 'tweak' before release could be missed – and the equipment later needs to be recalled or modified as a result.

To help manufacturers of machinery and equipment make sense of the requirements, and reduce the risk of delays through non-conformity and their associated costs, this paper will highlight some of the key differences between the IEC/EN 60204-1:2006 Safety of Machinery Standard and the NFPA 79 Electrical Standard for Industrial Machinery in the US. Although both standards seem similar, there are significant differences between the two that manufacturers need to consider when preparing machinery for the US market.

Background to the NFPA 79 – Electrical Standard for Industrial Machinery

The National Fire Protection Association (NFPA) was founded in 1896 and is the issuing body of a comprehensive set of regulations for fire protection – having developed and published more than 300 codes and standards.

For manufacturers of industrial equipment and machinery, the National Electrical Code (NEC), also known as NFPA 70, and NFPA 79 Electrical Standard for Industrial Machinery are the most important compliance considerations for electrical, mechanical, and plant engineering.

The NEC is the standard for the development of public and private building installations that connect to the supply of electricity.

The Code is updated every three years and has a high legal status. Each new issue must come from individual federal states and local bodies – and these are officially adopted as requirements.



Be aware however, that in different states, different issues of the Code apply. While some are using the current version, others are using previous versions. It is worth checking with your distributors which version of the Code applies locally when trying to plan your compliance activities. You can also check the National Electrical Manufacturers Association (NEMA) Trade Association website – which carries a useful territorial map.

(http://www.nema.org/stds/fieldreps/NECadoption/implement.cfm)

Additionally, in some larger cities, local variations to the NEC apply. The local building codes supplement or amend the NEC and should be considered according to your distribution destinations.

NFPA 79 vs. EN 60204-1

Despite certain similarities between the two standards, it is important for European Manufacturers to understand the differences between them as well. For instance, a machine built in accordance with NFPA 79 and supported by appropriate CE Marking documentation could theoretically be placed on the market in Europe. However, a machine built in accordance to EN 60204-1, would not be compliant with NFPA 79, and could not be installed in the US. This is because the requirements of NFPA 79 are significantly more detailed than those of EN 60204-1.

Definition of Industrial Machinery

The terminology of what constitutes an industrial machine differs significantly between NFPA 79 and IEC/EN 60204-1. NFPA 79 specifies particular types of equipment and processes. In Chapter 3, section 3.3.54 'Industrial Machinery' (Machine) is defined as:

" A power-driven machine (or group of machines working together in a coordinated manner), not portable by hand while working, that is used to process material by cutting; forming; pressure; electrical, thermal, or optical techniques; lamination; or a combination of these processes. Machine can include associated equipment used to transfer material or tooling, including fixtures to assemble/disassemble, to inspect or test, or to package. [The associated electrical equipment, including the logic controller(s) and associated software or logic together with the machine actuators and sensors, are considered as part of the industrial machine.]"

In section 3.35, EN60204-1 gives a more general definition of 'Machine' and 'Machinery' as:

"assembly of linked parts or components, at least one of which moves, with the appropriate machine actuators, control and power circuits, joined together for specific application, in particular for the processing, treatment, moving or packaging of material."

"The term 'machinery' also covers an assembly of machines which, in order to achieve the same end, are arranged and controlled so that they function as an integral whole."



Therefore, equipment that does not fall under this category of 'Machine' in the EU may do so in the US and will need to be assessed accordingly.

NB. A device or a small machine is covered in the normal case of a product standard and not by the NFPA 79. Examples include: UL 775 - Graphics Arts Equipment, UL 1740 - Industrial Robots; UL 73 - Motor-operated appliances.

Voltage Differences

The differences in scope of each document highlight the different applicable voltages between the standards:

Paragraph 1.1 of the NFPA 79 defines its scope:

"1.1.1 The provisions of this standard shall apply to the electrical/electronic equipment, apparatus, or systems of industrial machines operating from a nominal voltage of 600 volts or less, and commencing at the point of connection of the supply to the electrical equipment of the machine."

Paragraph 1 of the EN60204-1 defines its scope as:

"... applies to the application of electrical, electronic or programmable electronic equipment and systems to machines not portable by hand while working, including a group of machines working together in a co-ordinated manner. Adding, "is applicable to electrical equipment or parts of electrical equipment that operate with nominal supply voltages not exceeding 1000 V for alternating current (AC) and not exceeding 1500 V for direct current (DC) with nominal supply frequencies not exceeding 200Hz"

And adds:

"...is applicable to electrical equipment or parts of electrical equipment that operate with nominal supply voltages not exceeding 1000 V for alternating current (AC) and not exceeding 1500 V for direct current (DC) with nominal supply frequencies not exceeding 200Hz"

Terminology

As would be expected, both documents use a great deal of common terminology when describing machinery (such as "actuator," "ambient temperature," "barrier," and so on – though each with a slightly different definition – but similar enough to find a degree of parity between the two standards). Interestingly, NFPA 79 also specifies definitions for words key to the implementation and understanding of the requirements, whereas EN 60204-1 does not.

In Chapter 3 of NFPA 79, compliance terminology is specifically addressed:

"3.2.1 Approved	Acceptable to the Authority Having Jurisdiction.
3.2.2 Authority H	laving Jurisdiction: An organisation, office or individual responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, an installation, or a procedure.
3.2.3 Labelled	Equipment or materials to which has been attached a label, symbol or other identifying mark of an organisation that is acceptable to the authority having

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	jurisdiction and concerned with product evaluation, that maintains periodic inspection of production of labelled equipment or materials, and by whose labelling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.
3.2.4 Listed	Equipment, materials or services included in a list published by an organisation that is acceptable to the authority having jurisdiction and concerned with the evaluation of products or services, that maintains periodic inspection of production listed equipment or materials or periodic inspection of services, whose listing states that either the equipment, material or services meets appropriate designated standards or has been tested and found suitable for a specified purpose.
3.2.5 Shall	Indicates a mandatory requirement
3.2.6 Should	Indicates a recommendation or that which is advised but not required."

Related compliance terminology is defined and explored for European requirements in the Machinery Directive – regional legislation that governs the build and use of machinery in the EU.



Technical Documentation

Chapter 17 of NFPA 79 specifies more detailed technical documentation requirements for machinery than European manufacturers would be familiar with under EN 60204-1.

NFPA 79	EN 60204-1
1) Clear, comprehensive description of the equipment, installation and mounting, and the connection to the electrical supply or supplies	1) A main document (parts list or list of documents)
2) Electrical supply circuit(s) requirements	2) Electrical supply or supplies requirements
3) Overview (block) diagram(s) where appropriate	3) Information on the physical environment (e.g. lighting, vibration, atmospheric contaminants) where appropriate
4) Schematic diagram(s)	4) Overview (block) diagram(s) where appropriate
5) Information (where appropriate) on the following:	5) circuit diagram(s)
a) programming	
b) sequence of operation(s)	
c) frequency of inspection	
d) frequency and method of functional testing	
e) adjustment, maintenance and repair f)interconnection diagram	
g) Panel layouts	
h) Instruction and service manuals	
i) Physical environment (e.g. lighting,	
vibration, noise levels, atmospheric contaminants)	
6) A description (including interconnection	6) Information (as applicable) on:
diagrams) of the safeguards, interacting functions, and interlocking of guards with	Programming as necessary for use of the equipment
potentially hazardous motions	Sequence of operation(s)
	Frequency of inspection
	Frequency and method of functional testing
	Guidance on adjustment and maintenance, particularly of the protective devices and circuits,



NFPA 79	EN 60204-1
	recommended spare parts list, and list of tools supplied
7) A description of the safeguarding means and methods provided where the primary safeguards are overridden (e.g. manual programming, program verification)	7) A description (including interconnection diagrams) of the safeguards, interlocking functions, and interlocking of guards against hazards, particularly for machines operating in a coordinated manner
8) Information for safety lockout procedure	8) A description of the safeguarding and of the means provided where it is necessary to suspend the safeguarding (e.g. for setting or maintenance)
9) Explanation of unique terms	9) Instructions on the procedures for securing the machine for safe maintenance
10) Parts list and recommended spare parts list	10) Information on handling, transportation and storage
11) Maintenance instructions and adjustment procedures	11) Information regarding load currents, peak starting currents and permitted voltage drops; as applicable
 12) Reference information (where appropriate) on the following: a) Lubrication diagram b) Pneumatic diagram c) Hydraulic diagram d) Miscellaneous system diagrams (e.g. coolant, refrigerant) 	12) Information on the residual risks due to the protection measures adopted, indication of whether any particular training is required and specification of any necessary personal protective equipment

Operating Conditions

The standards share similar parameters for operating conditions, but again the USUS requirements are more detailed.

NFPA 79	EN 60204-1
4.3 Electrical Supply	
4.3.1 Alternating Current (AC) Supplies Voltage	



NFPA 79	EN 60204-1
Frequency	
Harmonics	
Voltage unbalance	
Voltage impulses	
Voltage interruption	
Voltage Dips	
4.3.3 Direct Current (DC) Supplies from	
Batteries	
Voltage	
Voltage Interruption	
4.3.4 Direct Current (DC) Supplies from	
converting equipment	
Voltage	
Voltage interruption	
Ripple (Peak to Peak)	
4.4 Physical Environment	4.4.1General
General	4.42 EMC
EMC	4.4.3 Ambient temperature
Ambient operating temperature	4.4.4 Humidity
Relative Humidity	4.4.5 Altitude
Altitude	4.4.6 Contaminants
Contaminants	4.4.7 Ionizing and non-ionizing
Non-ionizing radiation	radiation
Vibration, shock and bump	4.4.8 Vibration, shock and bump
4.5 Transportation and storage	4.5 Transportation and storage
4.6 Provisions for handling	4.6 Provisions for handling
4.7 Installation & Operating Conditions	4.7 Installation
4.8 Available fault current	
	5.6 Protection against
	unauthorized, inadvertent and/or
	mistaken connection
6.5 Protection Against Residual Voltages	
6.6 Arc Flash Hazard Warning	
	7.7 Earth fault/residual current
	protection



NFPA 79	EN 60204-1
7.9 Power Factor Correction Capacitor	
Overcurrent Protection	
8.3 Control Circuits	
8.4 Lighting Circuits	
11.5 Spaces Around Control Cabinets and	
Compartments.	
Chapter 19: Servo Drives and Motors	

Cabling Requirements

The requirements for machine cabling differ between the two standards, largely due to the differences in grid currents and the colour coding of wiring. For example, in Europe the grounded neutral conductor cable is blue, whereas in the US it is white or grey. The PE conductor (grounding conductor) in Europe is green and yellow, whereas in the US it can be either green, or green and yellow.

Machines carrying EU colour coded cabling will be non-complaint in the US, so manufacturers will need to source appropriate NA cable instead. Additionally, particular connectors may be required.

Additional differences include:

- 1. Common voltage systems in the US are always 60Hz
 - a. 480/277V 3-phase
 - b. 120/208Y 3-phase and single phase
 - c. 120/240V 3-phase and single phase
- 2. IP ratings are not the same as the UL Type ratings
- 3. Supplementary Protection vs. Branch Circuit Protection
- 4. Receptacles shall be of a NEMA 15R or 20R configuration. Requirements of GFCI Protection for Receptacles
- 5. The lighting circuit voltage shall not exceed 150 volts between conductors.
- 6. Conductor types must be equivalent to the types found in 12.3.1. The conductor properties must have equivalent:
 - i. insulation thickness
 - ii. temperature rating
 - iii. cross sectional area
 - iv. voltage rating
 - v. flame retardant
 - vi. environmental concerns
- 7. Raceways, Support Systems, Connection Boxes and Other Boxes.
 - i. Flexible Metal Conduit (FMC).
 - ii. Intermediate Metal Conduit (IMC).



- iii. Liquidtight Flexible Metal Conduit (LFMC)
- iv. Liquidtight Flexible Nonmetallic Conduit (LFNC).
- v. Rigid Metal Conduit (RMC).
- vi. Rigid Nonmetallic Conduit (RNC).

Types of machines covered by NFPA 79

Annex C, Examples of Industrial Machines Covered by NFPA 79 (*This annex is not a part of the requirements of this NFPA document but is included for informational purposes only.*)

- C.1 Machine Tools. Examples of machine tools are as follows:
 - (1) Metal cutting
 - (2) Metal forming
- C.2 Plastics Machinery. Examples of plastics machinery are as follows:
 - (1) Injection molding machines
 - (2) Extrusion machinery
 - (3) Blow molding machines
 - (4) Specialized processing machines
 - (5) Thermoset molding machines
 - (6) Size reduction equipment
- C.3 Wood Machinery. Examples of wood machinery are as follows:
 - (1) Woodworking machinery
 - (2) Laminating machinery
 - (3) Sawmill machines

C.4 Assembly Machines.



C.5 Material-Handling Machines. Examples of material handling machines are as follows:

- (1) Industrial robots
- (2) Transfer machines
- (3) Sortation machines

C.6 Inspection/Testing Machines. Examples of inspection/testing machines are as follows:

- (1) Coordinate measuring machines
- (2) In-process gauging machines
- C.7 Packaging Machines. Examples of packaging machines are as follows:
 - (1) Carton-strapping machines
 - (2) Drum-filling machines
 - (3) Palletizing machines

© National Fire Protection Association

Application of the standards

How the NFPA 79 and IEC/EN 60204-1 are applied in each territory is essentially the same:

- Both are used by manufacturers during the design phase as a reference when 'designing for compliance' for a target territory
- Both would be used as a reference source locally by specifiers looking to purchase geographically compliant equipment
- In the relevant territory, each would be used by field inspectors, assessing and certifying equipment on site – alongside other applicable standards such as the ANSI-UL 508A Standard for Industrial Control Panels – Cabinets, or the ANSI UL 1740 Standard for Robots and Robotic Equipment.
- Test and certification houses will use the standards as the basis of their assessment programmes before a product is released for sale.



• In the US, Authorities Having Jurisdiction (AHJs), will use NPFA 79 as part of their enforcement activities to check equipment on-site – but this is often refined further by local interpretation of the standard and the application of additional local laws on-site, such as the NFPA 70 National Electrical Code, NFPA 70E Standard for Electrical Safety in the Workplace and CFR 1910 – Federal Law

In the EU, the emphasis is largely on compliance with relevant directives, rather than specific standards. Whilst proving you can meet the requirements of an applicable standard can be used as evidence of conformity with a particular directive; other considerations such as labelling, marking, a Declaration of Conformity, the generation of a technical file, and in some cases risk assessment, also need to be considered.



Conclusions

Just as the European and Asian territories have a mixture of requirements for importers in specific regions - so too does the US.

The NFPA 79 Committee is working towards harmonising the Standard with IEC/EN 60204-1 and whilst this process is ongoing, manufacturers should continue to check the requirements state-to-state to ensure that they have appropriate proof of compliance in place to prevent impeded market access.

However, even harmonisation won't remove all of the subtle complexities of US market compliance. Certain cities and states will continue to have variant requirements which their Authorities Having Jurisdiction will continue to enforce – and therefore will still need to be met – but there is no easy solution to this and each project should be met on a case-by- case basis.

Manufacturers exporting to the US should to seek advice on their regional obligations from their distributors, the local authorities in their target states, and their partner certification bodies as early in the build cycle as possible to ensure all of the requirements are planned for to avoid expensive delays and potential product re-designs.

Tips for US Machine Compliance

- Check to see if your machine falls under the US regulations
- Check with your partner certification body as to the requirements for your target states and build provision for compliance with these into your compliance schedule (treat them as you would national deviations within the EU).
- You can ask your local distributors who the Authorities Having Jurisdiction (AHJs) are in your target states and contact them to check what they accept.
- Find as many states with common regulations as you can, and focus on exporting to these initially until you are able to accommodate variations in your product designs for the other territories.
- If you are building custom equipment for a particular site, obtain as much information as you can about the site environment, the equipment that yours will be connected to, and the local requirements of the AHJs.
- Check your technical documentation carefully to make sure it complies with NFPA 79. The requirements for the US are more specific than European requirements.



• Purchase a copy of the NFPA 79 Standard as a source of reference.

Glossary

- AHJ Authority Having Jurisdiction local authority, gives the operator the authorization for the connection of electrical equipment.
- ANSI American National Standards Institute Standards writing body (e.g. ANSI / NFPA 79 or ANSI / UL 73).
- ASME American Society of Mechanical Engineers standards writing body
- CEC Canadian Electrical Code or California Energy Commission depending on the geographical location concerned.
- CSA Canadian Standards Association standards writing body
- ESA Electrical Safety Authority responsible for electrical safety in Ontario, Canada.
- ETL A Certification Mark for the US is awarded by Nationally Recognised Test Laboratory (NRTL) Intertek to demonstrate complete compliance with appropriate product Standards.
- FCC The Federal Communications Commission is an independent authority responsible for the regulation of radio, television, satellite and cable (EMC) communications. It also assesses devices for compatibility with their own and other standards.
- NEC National Electrical Code, NFPA 70.
- NEMA National Electrical Manufacturers Association standards body, such as classification of enclosures (NEMA type), similar to IP protection
- NFPA National Fire Protection Association issues Standards such as NFPA 79 "Electrical Standard for Industrial Machinery" (similar to EN 60204).
- NRTL National Recognized Testing Laboratory an OSHA accredited laboratory for testing and certification of electrical equipment with the capability to issue certification marks (e.g. ETL)
- OSHA Occupational Safety & Health Administration, the US Accrediting body and part of the US Department of Labour (Comparable to the Health & Safety Executive in the UK)



- SCC Standards Council of Canada including the accredited testing laboratories in Canada.
- UL Underwriters Laboratory standards writing body.

How Intertek can help with US territory compliance

- We are a Nationally Recognised Test Laboratory (NRTL) able to test and certify (with the ETL Mark) products for compliance in the US market .
- We can offer field labelling and on-site machine inspections
- As recognised and accredited experts in machine technology, we can provide technical interpretations on standards and 'engineering judgements' on custom equipment that requires assessment but which falls outside the scope of current standards.
- Our experts work with US requirements at the city, state and national level every day and can provide guidance on what your obligations are in a particular territory.
- As an EU Notified Body and a US Nationally Recognised Test Laboratory (NRTL), we can provide gap analysis of your existing certifications and approvals to highlight what else you need to do.
- We are a testing and Certification Body within the IEC CB Scheme and can provide you with a range of testing and CB Test Certificates for market access.
- We have an international network of over 1,000 test laboratories, so we can provide services to you, close to the point of manufacture.

About Intertek

Intertek is a leading Total Quality Assurance provider to industries worldwide. Our network of more than 1,000 laboratories and offices and over 40,000 people in more than 100 countries, delivers innovative and bespoke Assurance, Testing, Inspection and Certification solutions for our customers' operations and supply chains.



Source documents

NFPA 79 Electrical Standard for Industrial machinery 2012 Edition

BS EN 60204-1:2006 + A1: 2009 Safety of machinery – electrical equipment of machines Part 1: general requirements

For more information on specific testing and certification information, please contact Intertek at 1-800-WORLDLAB, email <u>icenter@intertek.com</u>, or visit our website at <u>www.intertek.com</u>.

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