



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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April XX, 2013

Ms. Diane J. Haithcock
Chairman, UL 1370
Underwriters Laboratories
12 Laboratory Drive
Research Triangle Park, NC 27709-3995

Subject: Comments to *Standard for Unvented Alcohol Fuel Burning Appliances, UL 1370*

Dear Ms. Haithcock:

The U.S. Consumer Product Safety Commission (CPSC) staff¹ respectfully submits the following comments to UL 1370:

- The title should be changed to:
Standard for Large and Wall-Mounted Unvented Alcohol Fuel Burning Appliances

This standard applies to a limited number of unvented alcohol fuel-burning appliances only. The title should reflect better the appliances that are covered by the standard. This standard only covers appliances that are larger than a specific size and intended to be stationary or mounted to a wall.

- CPSC staff recommends the addition of a new requirement:
7.2.4 Pourable fuel shall be allowed only in appliances with a separate and distinct fuel filling location, separated from the fuel-confining part by at least 3 in (7.62 cm) in distance or by a physical barrier such as glass. All other appliances shall be required to use non-refillable canisters as the fuel source.

As described in CPSC staff's Firepots and Gel Fuel advance notice of proposed rulemaking package²:

¹ The views expressed in this letter are those of CPSC staff and they have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

² The package can be found at <http://www.cpsc.gov/PageFiles/91523/firepotANPR.pdf>.

CPSC staff testing has shown that there is a significant potential for an explosion when pouring alcohol fuel from a bottle over a flame. Under normal conditions, the headspace above the alcohol, whether in liquid or gel form, is between the lower and upper flammable limits. When a flame is present, it can pass into the bottle through the mouth and explode the headspace. This explosion can force the liquid or gelled alcohol to eject from the bottle creating a burning fireball that can ignite combustibles within several feet of the bottle. The best way to safeguard against this hazard on the appliance side is to separate the flame location and fueling location or to use non-refillable canisters.

Thank you for your consideration of CPSC staff's request.

Sincerely,

Scott Ayers

cc: Colin Church, Voluntary Standards Coordinator, CPSC