



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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Re: STP Ballots and Comments, UL/ULC 30, *Joint Standard for Safety for Metallic and Nonmetallic Safety Cans for Flammable and Combustible Liquids*

Dear Jeffery and John,

U.S. Consumer Product Safety Commission (CPSC) staff is actively participating in the UL STP 30 development of the next edition to UL/ULC 30, *Joint Standard for Safety for Metallic and Nonmetallic Safety Cans for Flammable and Combustible Liquids*.<sup>1</sup> In particular, staff is interested in helping to develop requirements that mitigate the risks of flame jetting and similar hazards. Additionally, safety cans, although long thought of as an industrial product, can be purchased by consumers for in-home use in place of other types of fuel containers, such as gasoline containers. This joint safety standard should address both the risk of flame jetting and consumer usage patterns.

On May 28, 2021, UL issued a ballot to STP members on the current draft of the next edition of UL/ULC 30. Staff has reviewed the current draft and has the following comments.

Scope and Definition concerns

Rationale: Both the scope of the safety standard and the definition of safety can contain requirements for safety features. Including certain safety features in the scope and definition of the standard creates a problem where products that should be subject to the standard instead, may be considered out of scope, due to the lack of the safety feature.

For industrial applications, this is not a problem because applicable codes and workplace (OSHA) requirements stipulate that only products meeting this standard be used. However, these products are available to consumers, and the codes and workplace

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<sup>1</sup> The views or opinions expressed in this letter are solely those of the staff, and these views do not necessarily represent those of the Commission.

(OSHA) requirements are not applicable to consumer use. Because UL/ULC 30 contain requirements within the body of the standard for spring-loaded and self-closing openings, as well as FMD features, removing references to these important safety features in the scope and definition would cause no problem to listing products. However, leaving these important safety features within the scope and definition could lead to the unintended consequence of products being available to consumers without an applicable safety standard. Note that as the standard currently reads, requirements for self-closing and spring-loaded openings are not needed, because, by definition and scope, products that do not contain those features are not safety cans and are not covered by this safety standard.

Suggested changes: Section 1.1 (e) should be removed. Section 3.9, the definition of “Safety Can” should be changed to read similar to: “A safety can is a type of portable container with self-closing openings used to safely store and transport various types of hazardous liquids.”

#### Type I and Type II Safety Cans

Rationale: The current wording suggests that there may be more than two types of safety cans. CPSC staff suggested clarifying that there are only two types of safety cans.

Suggested changes: Section 1.3 should become an informative note and read similar to: “Safety cans are either Type I, which contain a single opening or port for both filling and pouring, or Type II, which contain two separate openings or ports one each for filling and pouring.” A new section 5.1 should be created with subsequent section numbering appropriately adjusted. This new section should read similar to: “A safety can shall be designated as either Type I or Type II.”

#### Editorial suggestions in section 20.2:

Suggested changes: “proper valve open/close actuation per 5.8 and flow rate of at least 1.5 gpm shall be verified by the following test sequence . . .” And, “Calculate the flow rate by measuring the nominal 1.0 US gal . . .”

#### Permanently installed requirements

Rationale: The flame mitigation tests described in 21.4 and 21.6 should be consecutive sections because 21.6 provides an exception to 21.4. The permanently installed requirements can be moved before the test procedure in 21.4.

Suggested changes: Section 21.5 should move and become section 21.4, while section 21.4 should become 21.5.

#### Flame mitigation test development

Rationale: CPSC is currently working on developing a safety can-specific flame mitigation device test that would be applicable for a variety of FMD technologies that could be used in safety cans. The test is expected to be similar to the test developed

under a CPSC contract for ASTM F3429/F3429M. Staff will work closely with the STP 30 during the development process. UL should allow time for the development of this test before finalizing and publishing the next edition to UL/ULC 30.

Suggested change: Removing current section 21.4 test and adding a placeholder for a future test.

Please contact me if you have any questions. CPSC staff will continue to participate with the STP in developing the next edition to this important safety standard.

Sincerely,



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