



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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December 7, 2021

TRANSMITTED VIA EMAIL

Susan Eppes
ANSI Z245.30 Subcommittee Chair,
Container Safety
1550 Crystal Dr., Suite 804
Crystal City, VA 22202

Dear Ms. Eppes,

On May 5, 2021, CPSC staff¹ sent you a letter, concerning incidents that staff received about consumers who pushed a 95-96-gallon roll-out cart with the lid open, stepped/tripped on the lid, and fell forward into the cart sustaining serious injuries.² These incidents occurred from January 2006 through May 2021.

Staff advised that ANSI Z245.30, *Equipment Technology and Operations for Wastes and Recyclable Materials - Waste Containers - Safety Requirements*, contains a requirement that the lids shall be marked with a statement, such as: "CLOSE LID BEFORE MOVING." However, ANSI Z245.30 does not contain any requirements for a Signal Word, such as WARNING, a statement of hazard or consequence and other warning-related components to motivate compliance. Subsequently, staff requested that a task group be formed to consider adding a signal word, statement of hazard, and consequence, to strengthen the warning requirements to reduce the potential for future incidents. However, CPSC staff is concerned about the status of our request, because you have not responded to the letter of May 5, 2021.

Commission staff firmly believes that voluntary standards organizations, such as yours, are ideally suited to finding solutions to address this issue. Voluntary standards are always the

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

² Letter can be accessed electronically at the following link: https://cpsc-prod.ctacdev.com/s3fs-public/95-96-Gallon-Roll-Out-Trash-Cans-Letter.pdf?RNGdcSv6sBO4Ynjbm97oQLagmlcP_98L

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preferred approach to addressing safety hazards; and thus, CPSC staff encourages you to move quickly to form a task group to address this issue.

If you have any questions or need additional information, you may contact me at: swhite@cpsc.gov or at: (301) 987-2562.

Sincerely,

SHARON R. White

Sharon R. White

cc: Kirk Sander, Secretary, National Waste & Recycling
Association
standardards@wasterecycling.org
Jacqueline Campbell, CPSC Voluntary Standards
Coordinator