



U.S. CONSUMER PRODUCT SAFETY COMMISSION
5 Research Place, Rockville MD 20850

Priscilla Verdino, Chemist
Division of Laboratory Sciences

(301) 987-2502
Pverdino@cpsc.gov

September 20, 2021

TRANSMITTED VIA EMAIL

Gary Bell
Bell@buckeye-express.com
Technical Contact ASTM F2598
ASTM International
100 Barr Harbor Dr.
West Conshohocken, PA 19428-2959

Re: Comment on ASTM Ballot F15.42 (21-06) Item 6, Revision with Title Change to F2598-2009(2017)E1, *Consumer Safety Specification for Clothing Storage Chests* WK78040

Dear Mr. Bell,

Staff¹ of the U.S. Consumer Product Safety Commission (CPSC) has evaluated incidents of clothing storage chests, in addition to the proposed changes to the scope of ASTM F2598. Staff understands that these scope changes will lead to the development of a new standard that covers products such as storage ottomans and other similar clothing storage chests. The products that are within the scope of the new standard should require safeguards, such as adequate ventilation that would not interfere with the function of the device yet provide protection from known hazard patterns. Staff looks forward to collaboration on that standard.

Although no performance or test method changes were made to ASTM F2598, staff believes that the letter² sent on May 25, 2017 still applies today. The incident data transmitted on September 1, 2021 demonstrate that sealed storage chests are often used as toy chests, and the existing suffocation hazard is similar to that seen with toy chests. Although the design characteristic of “sealed storage chests” involve a tight lid closure, staff assesses the lid collapse hazard in these products is equivalent to the lid collapse hazard in toy chests. We ask that now that the scope of ASTM F2598 has been clarified, ASTM will quickly include performance requirements updates for the mechanical integrity of the hinge in F2598. Because these products are used as toy chests, the hinge should have the same mechanical integrity as ASTM F963, as specified in staff’s 2017 letter.

Respectfully,
Priscilla Verdino

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

² <https://www.cpsc.gov/s3fs-public/ASTM-Clothing-Chest-ballot-May-30-17-signed.pdf?VersionId=fe9hCtJvif9aJDKqkDuOwauJ.Cg5WI.n>