



April 12, 2024

TRANSMITTED VIA EMAIL

Ms. Heather Darrah  
Technical Director  
Portable Generator Manufacturers' Association  
1300 Sumner Avenue  
Cleveland, OH 44115-2851

Ref: CPSC staff letter dated 12/13/2023 concerning portable generator fuel leaks and related recalls  
PGMA letter dated 1/18/2024 responding to CPSC staff's 12/13/2023 letter

Dear Ms. Darrah:

U.S. Consumer Product Safety Commission (CPSC) staff<sup>1</sup> thanks you for your letter dated 1/18/2024, sent in response to CPSC staff's letter to the Portable Generator Manufacturers Association (PGMA) dated 12/13/2023 regarding fuel leaks on portable generators.<sup>2</sup> Staff appreciates that PGMA's technical committee has agreed to consider incorporating the recommendations staff made in its 12/13/2023 letter into a future revision of PGMA's standard, ANSI/PGMA G300-2023 *Safety and Performance of Portable Generators*. Staff would like to take this opportunity to propose language to incorporate the requirements of ANSI/OPEI B71.10-2018 *Gasoline Fuel Systems – Performance Specifications and Test Procedures for Off-Road Ground-Supported Outdoor Power Equipment* into G300. Staff proposes the following, with text to be deleted struck out and text to be added underlined:

#### **4.2 Fuel Systems**

##### **4.2.1 Fuel Systems – ~~General~~Gasoline**

Gasoline fFuel systems shall be so designed and constructed as to withstand the effects of normal and expected use, without leakage- and shall comply with all the requirements in B71.10-2018.

*Compliance is checked by all of the relevant tests of in ANSI/OPEI B71.10 – 20132018.*

Staff recommends the above changes because, as currently written, the manufacturer is permitted to determine which tests in B71.10 it will comply with. Allowing manufacturers this choice unnecessarily

<sup>1</sup> This letter was prepared by the CPSC staff. It has not been reviewed or approved by, and may not represent the views of, the Commission.

<sup>2</sup> Both letters are available online at [www.regulations.gov](http://www.regulations.gov), document ID number CPSC-2006-0057-0251



limits the safety benefits obtained when complying with all the requirements of B71.10. Furthermore, staff recommends that G300-2023 reference the most recent version of B71.10, which was published in November 2018 and went into effect in November 2020, rather than the 2013 version. The 2018 edition has a number of significant improvements over the 2013 edition to reduce the risk of fuel leaks from generator fuel tanks and all associated fuel system components. As noted in the “Foreword” section, the 2018 edition includes the following safety improvements:

- Fuel tank impact resistance testing
- Non-metal fuel lines need to conform to the performance criteria of SAE J30 (Standard for Fuel and Oil Hoses)
- Specifications for in-line, plastic fuel filters--new performance specifications include production leak testing, impact resistance testing, fuel resistance testing, and UV resistance testing
- Performance specifications for elastomeric component integrity which include elevated temperature fuel soak for all tanks assembly designs incorporating elastomeric components, fuel resistance testing, and ozone resistance testing
- Performance specifications for fuel shut-off valves which include production leak testing, impact resistance testing, fuel resistance testing, UV resistance testing, temperature testing, and actuation performance testing

As stated in staff’s 12/13/2023 letter, fuel that leaks out of or is expelled from a generator is a recognized fire and burn hazard. Performance and test requirements in B71.10-2018 address potential fuel leaks or expulsions from components on a portable generator. A recent recall involving a portable generator<sup>3</sup> illustrates the need for these requirements.

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<sup>3</sup> Recall 23-288, <https://www.cpsc.gov/Recalls/2023/Generac-Recalls-Portable-Generators-Due-to-Serious-Fire-and-Burn-Hazards>



In closing, staff strongly urges that PGMA's technical committee initiate the effort to revise G300 as soon as possible to incorporate staff's proposal and begin the process to address staff's other recommendations in its 12/13/23 letter.

Staff looks forward to continuing to work with PGMA to improve safety for these products.

Sincerely,

Janet Buyer  
*Mechanical Engineer*  
*Project Manager, Portable Generators*  
*Directorate for Engineering Sciences*

Cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator