



November 22, 2022

Mr. Phil Monckton  
Subcommittee F15.10 Chair  
ASTM International  
100 Barr Harbor Drive  
West Conshohocken, PA 19428

Dear Mr. Monckton:

On October 29, 2022, the U.S. Consumer Product Safety Commission voted unanimously to accept the revised voluntary standard, ASTM F2517-22e1, *Standard Specification for Determination of Child Resistance of Portable Fuel Containers for Consumer Use*, to be incorporated by reference under the Children's Gasoline Burn Prevention Act. The Commission further directed staff to "evaluate the safety impact of the recently approved changes, seek continual improvement of the standard within ASTM, and report to the Commission on such efforts within 180 days."

I ask that the ASTM F15.10 subcommittee meet in the near future, and no later than February 2023, to discuss the follow-up actions that the Commission directed. Staff is interested in working with the subcommittee to assess the safety impact of ASTM F2517-22e1 and establish a plan to revise ASTM F2517-22e1, if indicated, based on that assessment. Potential opportunities for improving the standard include assessing the risk of children's exposure to gasoline vapors during a momentary opening of a self-sealing spout, approving a family of portable fuel containers by additionally having children test the smallest and adults test the largest containers, and refining the instructions given to children and adults during testing.

Please contact me if you have any questions or concerns. I look forward to continuing to work with you on the continuous maintenance of this important voluntary standard.

Sincerely,

Scott Ayers

*CPSC Directorate for Engineering Sciences*

cc: Jacqueline Campbell – CPSC Voluntary Standards Coordinator  
Donald Mays – Chairman, ASTM Committee F15 on Consumer Products  
Molly Lynyak – Staff Liaison, ASTM Committee F15.10 on Consumer Products

Enclosure