



September 15, 2025

Babak Owlam
CSA Group, Gas Appliances
Project Manager
8501 East Pleasant Valley Road
Cleveland, Ohio, USA, 44131

Dear Mr. Owlam,

During a Fall 2024 ANSI/CSA boiler working group (WG) meeting, the group discussed the scope of the safety provisions under development and whether to include or exclude commercial gas boilers.¹ During that discussion, CPSC staff shared with the WG that: (1) the majority of CO leaks from boilers occurred at disconnected vents in the same room as the boiler; and (2) they were aware of CO incidents in which consumers had been injured or killed in commercial settings and given that reason, the WG should consider including commercial boilers in the safety provisions under development. As a follow-up to those discussions, I am forwarding a link to redacted CO-related IDIs involving gas boilers that reflect both scenarios.

CPSC staff encourages the ANSI/CSA boiler working group and Technical Subcommittee (TSC) to:

- 1) Review the IDIs;
- 2) Utilize the location of the leaks in the redacted IDIs to supplement your work on RFC#5, to include a hard-wired CO sensor mounted on the exterior of the boiler;
- 3) Determine whether the boilers involved are commercial or residential units;
- 4) Consider whether the failure modes observed in residential settings can also occur in commercial settings;
- 5) Consider whether these failures result in CO exposures; and
- 6) Consider including commercial boilers in the safety provisions under development.

CPSC is providing the redacted IDIs to the working group via the file transfer app Box at:

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



United States
Consumer Product Safety Commission

- For leak location:
<https://cpsc.box.com/s/9f7botxr5jatzm11h2jmt1qpw2n0nuka>
- For commercial boiler CO incidents:
<https://cpsc.box.com/s/zqnigdo1dv1q8vhqn6ercegk2df2h870>

Please distribute this letter to the boiler WG and Technical Subcommittee. I look forward to continuing to work with CSA to improve the safety of boilers. If you have questions or comments, please feel free to contact me.

Sincerely,

Ron

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