



July 3, 2025

Ms. Aimee Sinnott  
UL 2200 Standards Technical Committee Chair  
UL Standards and Engagement  
[amy.sinnott@ul.org](mailto:amy.sinnott@ul.org)

Dear Ms. Sinnott:

U.S. Consumer Product Safety Commission (CPSC) staff recently released a report, *Stationary Generators: The Carbon Monoxide Poisoning Hazard and Recommendations for Mitigation*, June 3, 2025.<sup>1</sup> The report documents the carbon monoxide (CO) poisoning hazard associated with stationary generators after Hurricane Ida caused widespread power outages in Louisiana in the Fall of 2021.<sup>2</sup> The following are a few of the main findings in the report:

- At least 105 homes had indoor CO exposures caused by stationary generators.
- 85 homes had their CO alarm activate; 20 homes did not mention the presence of a CO alarm or a CO alarm activation.
- 12 homes had one or more residents with CO poisoning symptoms. One of the homes had nine residents, one of whom was transported to the hospital and admitted for one night; the other eight transported themselves to the hospital where they were held for observation and released. At another home, one resident was transported to the hospital and was treated and released.
- For 49 of the homes, the distance from the generator's enclosure to the home's openings through which the generator exhaust traveled to enter the home was documented, 41 of which had distances greater than the minimum allowed in manufacturers' installation manuals.

Manufacturers' installation instructions rely on clearances in NFPA 37 *Standard for the Installation and Use of Stationary Combustion Engines and Gas Turbines*, which addresses the fire hazard these products pose to nearby structures; there is no standard or code that addresses the CO hazard. Stakeholders' past attempts to have installation requirements that will minimize the risk of CO

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<sup>1</sup> This letter and the report were prepared by the CPSC staff. They have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

<sup>2</sup> The report is available at this link

<https://www.cpsc.gov/Research--Statistics/Carbon-Monoxide-Stationary-Generators-The-Carbon-Monoxide-Poisoning-Hazard-and-Recommendations-for-Mitigation>



infiltrating into dwellings adopted into NFPA 37 have been unsuccessful.

The report concludes that addressing the CO poisoning hazard associated with stationary generators is needed. Staff recommends that the technical committee for UL 2200 *Standard for Safety: Stationary Generator Assemblies* consider these two approaches: (1) develop installation requirements for UL 2200 that will minimize risk of exhaust infiltration through openings into structures that can be entered or occupied, and (2) develop a requirement for UL 2200 that stationary generators must have engines with substantially reduced CO emission rates. Both approaches should include requirements for on-product markings and comprehensive information about the CO poisoning hazard in manufacturers' product literature and packaging. In addition, staff recommends that the technical committee for NFPA 37 increase the separation distance between the stationary generator and openings into structures from the current 5 feet to at least 25 feet.<sup>3</sup>

Staff recommends that TC UL2200 form a working group to develop the recommendations into a proposal of requirements for possible adoption into UL 2200. Staff will participate in such an effort.

The report's underlying data<sup>4</sup> from the Hurricane Ida CO incidents are available through the following link: <https://cpsc.app.box.com/s/ajufsg73shvfc6buicvnd4w6wxw15stn>. CPSC staff appreciates the efforts of the technical committee and looks forward to working with the committee to implement safety revisions to the standard.

Sincerely,

Janet Buyer  
*Mechanical Engineer*  
*Division of Mechanical and Combustion Engineering*  
*Directorate for Engineering Sciences*  
*Office of Risk Reduction*

Matthew Brookman, P.E., PMP  
*Senior Mechanical Engineer*  
*Division of Mechanical Engineering*  
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Cc: Jacqueline Campbell, CPSC Voluntary Standards Coordinator

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<sup>3</sup> Staff has sent a similar letter to NFPA to make them aware of the report and CPSC staff's current efforts.

<sup>4</sup> All personally identifiable information and manufacturer information are redacted.