



July 30, 2026

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

Dear Mr. Owlam:

Staff of the U.S. Consumer Product Safety Commission (CPSC) have been encouraged with the progress of the ANSI Boiler Technical Subcommittee (TSC) in addressing carbon monoxide (CO) poisoning deaths associated with gas boilers as highlighted in CPSC's Notice of Proposed Rulemaking published on October 25, 2023 (88 FR 73272).

In November 2024, the TSC established the Boiler CO Sensor Working Group (WG) to evaluate two CO-related proposals:

- 1) Request for Change (RFC) 4 – boilers shall be supplied with a battery-powered CO alarm for installation in the living space.
- 2) Request for Change (RFC) 5 – boilers shall have an integrated ambient CO sensor which shuts down the boiler when high CO is detected.

The WG and CPSC staff met regularly for discussions from November 2024 to May 2026, and the WG summarized its findings in a report delivered to the TSC chair, titled "Z21.13 CO Alarm Working Group Report." In July 2025, the WG submitted a proposal for RFC 4 to the Boiler TSC for review and approval and the report reiterated support for prioritizing RFC 4 for publication as soon as possible while continuing development of RFC 5.

However, during its final two meetings, the WG determined that RFC 5 was not yet developed enough to support actionable standards language. Nevertheless, the WG was disbanded following its May 8, 2026, meeting. The WG chair acknowledged that additional work would be needed and advised that any interested WG or TSC member could submit a new RFC to continue this effort. CPSC staff is concerned that without continued progress, the momentum built by the prior WG to develop RFC 5 is at risk of being lost.

In addition, the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) is working with the National Institute of Standards and Technology (NIST) on a study to validate the use of integrated CO sensors in gas furnaces to shut off the appliance when hazardous levels of CO are detected. CPSC staff regularly attend the gas furnace WG meetings and will support NIST in its validation work with AHRI, which is tentatively planned to begin in Fall 2026. Staff

is concerned that the gas boiler WG will lose valuable opportunities to coordinate with the AHRI-funded CO Sensor Validation Study if work on RFC 5 does not continue.

Action Requested

CPSC staff requests that the Z21.13 Boiler TSC establish a new Boiler CO Sensor Working Group tasked specifically with developing RFC 5 into a draft standards proposal, using the report "Z21.13 CO Alarm Working Group Report" for background.

Rationale

The prior WG concluded with significant progress on RFC 5, but without completing the required standards development work. Establishing a new WG at this time is prudent for the following reasons:

1. **Maintain momentum** generated by the original WG toward the development of updated safety requirements.
2. **Leverage synergy** with the ongoing AHRI funded CO Sensing Device Validation Study.
3. **Align with the efforts of the newly established ANSI CO Sensor WG**, which is developing a standalone CO sensing device standard applicable to residential gas fired furnaces and boilers.
4. **Advance safety improvements** to help prevent future CO related deaths and injuries associated with residential gas boilers.

I appreciated the opportunity to serve on the original WG and commend the chair and members for their collaborative and productive efforts. Their work provides a strong foundation for this next phase of development, and timely formation of a new WG will help ensure continuity and continuing forward progress.

Sincerely,



Ronald A. Jordan

Mechanical Engineer

Division of Mechanical and Combustion Engineering

Directorate for Engineering Sciences
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cc:

ANSI Boiler Technical Subcommittee members
Shannon Corcoran, Air Conditioning, Heating, and Refrigeration Institute (AHRI)
Jaqueline Campbell, Voluntary Standards Coordinator, U.S. CPSC
Han Lim, Mechanical and Combustion Program Manager