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U.S. CONSUMER PRODUCT SAFETY COMMISSION
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April 25, 2005

Mike Adams
Chairman, ASTM F15.10

RE: Ballot F15.10 (05-01) Determination of Child-Resistance of Portable Fuel Containers for Consumer Use.

Dear Mr. Adams:

These comments are those of the staff of the U.S. Consumer Product Safety Commission (CPSC), have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission. The CPSC staff is providing comments in response to subcommittee ballot F15.10 (05-01) Determination of Child-Resistance of Portable Fuel Containers for Consumer Use.

The revised standard addresses several of the comments the CPSC staff expressed in past correspondences. However, several comments and clarifications that were raised by CPSC staff in a correspondence dated August 6, 2004, in response to ballot F15.10 (04-02) are not addressed in this current revision. A reiteration of our previous comments that are unaddressed and several additional comments are outlined below.

1.3 This specification is based upon 16CFR1700.15 and 16CFR1700.20

The CPSC staff requests again that this line be deleted. This statement may lead to confusion because the gas can standard is not identical to the standards referenced under the PPPA. The CPSC staff does not believe that it is necessary to reference the tests upon which the gas can standard is based.

2.2 Federal Standards

In order to avoid confusion, the CPSC staff requests again that a second footnote be added to this section that states; "Testing procedures specified in this standard differ from testing requirements under the PPPA." Or alternatively, the CPSC staff requests eliminating Section 2.2.

3.1.1 Containers and closures shall first meet all requirements of Specifications F2234....

The CPSC staff requests clarification of this section. By eliminating the reference to other ASTM gas can standards found in previous drafts, is it intended that in order to be "child-resistant" a gas can must also be spill-resistant?

3.1.2 Containers, components, and closures shall be tested as described in Section 4 after having been subjected to:....

The CPSC staff assumes that the specific references to heat aging and UV light exposure were eliminated from the preconditioning requirements of 3.1.2 because these tests are part of ASTM F2234. The results of these tests are important since the child-resistant features must function for the life of the products.

4.1.1 For testing per Section 4, containers with multiple closures shall have each closure tested separately. Closure(s) not being tested shall be sealed off.

The CPSC staff has commented previously that the gas container should appear as it would normally. It is unclear from these instructions how "sealed off" closures would appear. The staff suggests that the alternative openings be sealed so that they will not function but the closures appear as they would normally.

4.1.3 ... torque dependent closures shall be secured at the same on-torque as applied on the packaging line...

The CPSC staff reiterates that the gas can samples tested with children should be closed by an adult as would normally occur in the household. Having the closures closed to a specified torque value does not represent the condition of the gas container found in the household.

4.1.6 All containers to be tested shall be empty of contents and conditioned per 3.1.3.

The CPSC staff recommends that this section be modified to read, "All containers shall be tested in the normal use configuration (e.g. spout out) half-filled with water (1 gal. of water in a 2-gal. container) and conditioned per 3.1.2." The 3.1.3 reference is a transcription error from the last version of the standard. The CPSC staff believes gas cans should contain water when tested with children because the measurement of leakage during this test method is important since the hazard associated with gasoline containers is related to the flammability of the gasoline and the fumes. In addition, the CPSC staff has commented in the past on the inadequacy of the leakage test method specified in F 2234-03 due to the unreasonably high torque values specified in the standard. The CPSC staff continues to recommend that gas cans tested with children should contain water. The loss of water during testing for child-resistance should be noted by weight, and applied to the test results, since section 4.3 specifies that a failure is a child who gains access to the contents.

5. Senior testing

The CPSC staff continues to believe that proper adult usage of gas cans is an important safety issue. Therefore, the CPSC staff recommends that the adult test participants should have to open all of the gas can features during a single test. The current draft directs the seniors to open the container according to the instructions on the cap. The language in the current test method is unclear. Since gas cans have multiple features (closure and spout), it is unclear how any given gas can will be tested. The CPSC staff reiterates the offer to work with the ASTM subcommittee to determine the appropriate time periods for the senior test method. In our correspondence dated, August 6, 2004, we proposed testing conventional gas cans with seniors to see how long it takes them to use these containers. The time periods for senior testing of child-resistant gas cans could be modified accordingly, if necessary.

5.2 Screening procedures

The CPSC staff believes that conventional (non-CR) gas containers should be used for the screening of adults who do not open the gas cans. The current standard specifies two different types of closures but not the size of the closures. The purpose of the screening is to make sure that child-resistant packaging is not being tested by people who are unable to use conventional packaging. Since the size of the closures is a consideration with gas cans, the CPSC staff continues to believe that testing with conventional gas cans is the best way to screen adults.

Please contact me if you have questions about these comments.

Sincerely,

/S/

Suzanne Barone, Ph.D.

Barone, Suzanne P.

From: Barone, Suzanne P.
Sent: Monday, April 25, 2005 8:26 AM
To: 'Mike Adams'; 'Morgan, Katharine'
Subject: RE: ballot ASTM F15.10 (05-01)



comments on ballot
05-01fin.pd...

Mike and Kathie,

Attached, please find a copy of the CPSC staff comments on the draft gas can ballot. I faxed a signed copy to Kathie.

I will be happy to discuss our comments with you.

Sincerely yours,

Suzanne

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