

LOG OF MEETING
DIRECTORATE FOR ENGINEERING SCIENCES

SUBJECT: Meeting of ASTM Subcommittee F15.31 for Five-Gallon Buckets

DATE: September 21, 1994

PLACE: East West Towers Bldg.
Bethesda, Maryland

LOG ENTRY SOURCE: John Preston, ESME *JP*

COMMISSION ATTENDEES:

Jim Bradley, ESME
Mary Donaldson, ECSS
John Preston, ESME
George Sweet, EPHF

Sue Cassidy, EPHA
Ron Medford, EXHR
George Sushinsky, ESEL

CPSA 6 (b)(1) Cleared

No Mfrs/PrvtLblrs or
Products Identified *10-24-94*
Excepted by *JK*

NON-COMMISSION ATTENDEES

John Blair, Du Pont Corp.
Don Barkas, CA Firefighters
Mark Brothers, Century Ind.
John DiFazio, CSMA
Robert Hultquist, PSCI
Jim Kirby, Letica Corp.
Marilyn Langill, Consumer
Thomas Pratt, Plastics
Steve Tague, Landis Plastics
Nick Wakeman, PSL

David Baker, Holland & Knight
Don Brothers, Century Industries
Charlie Byers, USG Corp.
Jim Engebretson, Bennett Ind.
Shari Jackson, SPI
Chris Lancette Ecolab
Archie Munn, NAMPAC
Ed Rowe, Bennett Ind.
John von Holdt, Plas-Tool Co.

SUMMARY OF MEETING

Copies of the minutes of the 6/13/94 meeting were made available to those who had not received a copy. Likewise, copies of the Draft labeling standard and a log of the 7/20/94 meeting of the Bucket Performance Task Group were distributed. The minutes of the 6/13/94 subcommittee meeting were accepted without change.

Responding to a request from the chairman, John Preston reviewed the status of the ANPR concerning 5-gallon buckets that was published in the Federal Register on July 8th. Preston stated that 85 comments had been received in response to the ANPR and will be reviewed and summarized by CPSC staff in the near future. Preston noted that these comments are available to the public in the Office of the Secretary at CPSC HQ.

Preston also stated that, as part of the rulemaking process, CPSC staff is issuing a contract to perform an industry and consumer survey on 5-gallon buckets. The industry survey will determine what products are shipped in 5-gallon buckets, how many products are shipped, costs involved in making changes to the buckets, who are manufacturers and who are fillers, etc. The

exposure survey will attempt to determine who is at risk, from where consumers obtain 5-gallon buckets, and for what they use these products in and around the home. Preston said that reports of these surveys are anticipated to be completed by the end of the 3rd quarter of Fiscal Year 1995.

In response to a question, John Preston said a log of a 9/15/94 meeting he attended with staff of other government agencies at the Dept. of Transportation on the subject of 5-gallon buckets will soon be available from the Office of the Secretary.

Comments accompanying negative ballots received in an ASTM F15 Main Committee ballot of the permanent ASTM labeling standard for 5-gallon buckets were reviewed. Significant discussion ensued on a suggestion from CSMA that buckets within the scope of the standard should be described by dimensions rather than volumetric capacity. Since there is currently uncertainty on the precise dimensions of buckets presenting a drowning hazard, the suggestion was not accepted. An editorial change from CSMA was accepted and will add the words "or to contradict" to Section 1.1. This will now state: "It is not the intention of this specification to include or contradict any other labeling requirements or other applicable regulations or standards." The chairman stated that a letter ballot will be mailed to members of the entire F15.31 subcommittee to uphold the resolution of the negative votes.

There was discussion regarding the compliance with the requirements of the ANSI standard for Product Safety Signs and Symbols, ANSI Z535.4, when a warning is printed directly onto a plastic container rather than onto a label adhering to the container. John Preston was asked to seek a clarification of section 7.6.3 of this ANSI standard.

Mr. Frederick Huber displayed a prototype of a 5-gallon bucket that he had designed to attempt to reduce the drowning hazard presented by such products. Mr. Huber explained that this bucket was equipped with a removable ring on the rim of its base which, when removed, makes the bucket relatively unstable so that it would tip in the event that a child should begin to fall into the bucket. Those present at the meeting believed that the Mr. Huber's bucket offered some merit in addressing the drowning hazard and his idea will be presented to the 5-gallon bucket performance task group at its next meeting.

There was discussion on a letter from Robert Erlich regarding his suggestions that a handleless bucket or one with a coin embedded in the plastic may reduce the drowning hazard. In the latter suggestion, upon emptying the bucket of its original contents a person removing the coin would destroy the bucket or render it incapable of containing a liquid. No agreement was reached on whether these suggestions were practical.

Mr. John von Holdt displayed a prototype of a bucket having plastic barbs molded into the perimeter of the upper rim. Mr. von Holdt stated that these may discourage a child from holding onto the rim and, in the event the a child did begin to fall into the bucket the barbs may catch the child's clothing and prevent submersion in liquid in the bucket. Meeting attendees appeared to believe that Mr. von Holdt's prototype bucket had merit in reducing the drowning risk.

Since the chairman of the bucket performance task group was unable to attend this subcommittee meeting, Charlie Byers presented a report on the last meeting of the performance task group (TG) held on 7/20/94 in Chicago. Mr. Byers said that the TG now regarded that buckets meeting an instability requirement were not viewed as being practical to the primary user. Performance requirements for internal restrictors, buckets with hard to or non-removable covers, barbs on the upper perimeter, recycling, and buckets that are consumed by the primary user were all considered viable performance requirements

David Baker reported on the progress of an industry sponsored campaign to educate consumers on the drowning hazard presented by using 5-gallon buckets in the home. The firm of Ogilvy, Adams, & Rinehart has developed the program that began with radio messages on September 2nd. These messages may be aired by 500 stations concentrating on Afro-American audiences and 450 stations geared toward Hispanic audiences. The radio campaign will be followed by television safety messages and a poster campaign. It will also be a multi-year campaign. Funding is being provided by the five major plastic bucket manufacturers together with the Plastic Shipping Container Institute.

There was discussion on the degree of conformance to the current emergency bucket labeling standard. It was reported that all of the five major plastic bucket producers have agreed to use the warning label.

John Blair stated that he would like to withdraw from his position as chairman of the F15.31 Subcommittee and asked that nominees for a new chairman be submitted. He noted that he would not be discontinuing his support of the activities of this subcommittee.

Before adjourning the meeting, it was agreed that the next meeting would be held on December 1st at 10:00 a.m. in Room 410BC at CPSC Headquarters in Bethesda, MD.

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