



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
5 Research Place, Rockville, MD 20850

January 9, 2020

Mr. Bill Tobin  
ASTM F15.72 Subcommittee Chair  
100 Barr Harbor Dr.  
West Conshohocken, PA 19428

Re: ASTM Ballot F15 (19-12): Item 24, *Specification for Flame Mitigation Devices on Disposable Fuel Containers* WK60590

Dear Mr. Tobin:

U.S. Consumer Product Safety Commission (CPSC) staff<sup>1</sup> is very interested in developing requirements for flame mitigation devices on consumer fuel containers. The CPSC has been actively participating in the development of flame mitigation devices on disposable fuel containers, including sponsoring research and development. I am the task group chair for this ASTM activity.

The task group has worked hard over the last 2 years to develop requirements and draft a proposed standard. The task group completed a draft standard that was included in a recent ballot sent to the ASTM F15.72 subcommittee on September 16, 2019, as ballot F15.72 (19-01). That ballot passed, and was automatically included in the next full committee ballot F15 (19-12) as Item 24, *Specification for Flame Mitigation Devices on Disposable Fuel Containers* WK60590. Although no subcommittee members voted negative on the subcommittee ballot, three voters made substantial comments on the structure and clarity of several requirements within the standard that should be included in the draft standard.

Additionally, on a December 12, 2019 task group teleconference, the task group agreed that two additional requirements were needed, one requiring that the flame mitigation device be permanently attached, and the other for a minimum out-flow rate of the flame mitigation device. Therefore, I am voting negative on this ballot item so that the task group can make appropriate changes to the draft standard. The task group expects to develop the proposed changes over the next 2 months, and the revised draft standard will be ready to send to a full ASTM F15 committee ballot in March or April 2020.

Submitted ballot rationale:

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<sup>1</sup> The views or opinions expressed in this letter are solely those of the staff, and these views do not necessarily represent those of the Commission.



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During a December 12, 2019 teleconference, the F15.72 task group responsible for developing this standard agreed that two new requirements should be added to the standard before it is published: one requirement to ensure that the flame mitigation device is “permanently” attached to the container, and a second requirement ensuring a minimum outflow rate. Additionally, three subcommittee voters provided comments that the task group wants to incorporate into the standard before balloting again.

Sincerely,

Scott Ayers  
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Cc: Patricia Edwards, CPSC Voluntary Standards Coordinator  
Molly Lynyak, ASTM F15 Staff Manager