



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
4330 EAST WEST HIGHWAY  
BETHESDA, MD 20814

July 11, 2016

Greg Knott  
Director, Industry Affairs  
Outdoor Power Equipment Institute (OPEI)  
341 South Patrick Street  
Alexandria, VA 22314

Dear Mr. Knott:

Thank you for your letter of May 31, 2016, providing feedback on our meeting of February 10, 2016, and the CPSC staff report, "Study of Fuel Leaks Associated with Outdoor Ground-Supported Gasoline-Powered Equipment."<sup>1</sup> Hereafter, the report will be referred to as: "CPSC Staff Report." It was a pleasure to meet you and the OPEI B71.10 members at the February meeting. We engaged in productive discussions regarding fuel leaks from outdoor ground-supported gasoline-powered equipment ("OGSGPE").

In your May 31 letter, you raised several concerns that surfaced during our meeting and after your independent review of incident/recall data. This letter addresses those concerns.

CPSC staff agrees with your assessment that the rate of reported stress cracks and seam splits from fuel tanks has decreased. Before the first edition of the American National Standards Institute ("ANSI"), and Outdoor Power Equipment Institute standard ANSI/OPEI B71.10 – *Standard for Ground Supported Outdoor Power Equipment – Gasoline Fuel Systems* in 2008, there were 13 recalls from 2000 to 2008, related to stress cracks/seam splits for snow blowers and lawn mowers. In contrast, there was only one recall from 2009 to 2015.<sup>2</sup> Based on the discussion at our technical meeting in February, where OPEI members explained the changes made in the ANSI/OPEI B71.10 standard and the associated reduction in reported stress cracks and seam splits, CPSC staff, at this time, does not recommend modifications to the B71.10

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<sup>1</sup> Lim, H. "Study of Fuel Leaks Associated with Outdoor Ground-Supported Gasoline-Powered Equipment," U.S. Consumer Product Safety Commission, September 2015, Internet Source: <http://www.cpsc.gov/Global/VoluntaryStandards/FuelLeakOutdoorGasolineEquipmentSept2015.pdf>

<sup>2</sup> CPSC Recall Notice 15-222 (not included in the CPSC staff report). Internet Source: <http://www.cpsc.gov/en/recalls/2015/scag-power-equipment-recalls-lawn-mowers/> and Scag Company Website: <http://www.scag.com/libertyz-fuel-tank.html>

standard regarding the stress crack performance tests (elevated temperature and cyclical pressure tests).

CPSC's Staff Report identified components, such as fuel filters and vent grommets, which were the subject of recalls. CPSC staff is concerned because these components are not addressed in the current ANSI/OPEI B71.10 standard. In your letter, you stated that the committee is evaluating these components. CPSC staff appreciates the committee's efforts on this regard.

Although CPSC staff commends the B71.10 committee for their willingness to evaluate components currently not covered in the ANSI/OPEI B71.10 standard, such as fuel filters and vent grommets, CPSC staff respectfully requests that the committee consider examining the other outstanding issue involving moving parts contacting fuel tanks. At least three fuel tank recalls<sup>3</sup> post-2009 were due to objects such as drive belts or pulleys contacting the tanks, rubbing holes in them, and causing fuel leaks. CPSC staff recommends the B71.10 committee examine this issue further to determine if spacing requirements in future versions of the ANSI/OPEI B71.10 standard can reduce the likelihood of fuel tank failures due to objects contacting the tanks.

Your letter requests that CPSC staff consider revising statements in the CPSC Staff Report. Regarding the footnotes on page 10 of your letter, you expressed concern about CPSC staff's characterization of particular recurring issues that had led to fuel leaks and that industry standards may not be replicating real-world scenarios. CPSC staff believes the statements in the CPSC Staff Report do not need revision because the current ANSI/OPEI B71.10 standard does not have any requirements for fuel filters, vent grommets, and moving objects, such as drive belts contacting fuel tanks, all of which have caused fuel leaks. The CPSC Staff Report statements do not single out any particular issue; rather the statements generally describe how the various fuel leak scenarios may be recurring and how some scenarios may not replicate real-world conditions.

CPSC staff looks forward to future dialogue with the OPEI B71.10 committee, to work collaboratively to improve future versions of the ANSI/OPEI B71.10 standard, with the goal of reducing the risk of fuel leaks associated with OGSPE.

Sincerely,

Han Lim,  
Mechanical Engineer  
Mechanical and Combustion Engineering Division  
Directorate for Engineering Sciences

cc: Patricia Edwards, CPSC Voluntary Standards Coordinator

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<sup>3</sup> CPSC Recall Notices 13-048, 13-187, and 13-734, searchable by recall notice number at [www.cpsc.gov](http://www.cpsc.gov).