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U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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OCT 29 2003

Ronald Raboin  
Chairman, ASTM F15.10

RE: Standard Specification for Child Resistant Portable Gasoline Containers for Consumer Use.

Dear Mr. Raboin:

The staff of the U.S. Consumer Product Safety Commission (CPSC) is writing to clarify our position on the Standard Specification for Child Resistant Portable Gasoline Containers for Consumer Use (draft standard). We provided comments that recommended further study in certain areas during the voting process on ballot F15 (03-03) on April 7, 2003. A copy of these comments is enclosed. This letter provides additional information regarding our comments.

The CPSC staff continues to believe that the draft standard should not be finalized as currently written. The current version is intended to be technically equivalent to the testing protocols and standards defined in the regulations of the CPSC's Poison Prevention Packaging Act. In the comments of April 7, 2003, the CPSC staff expressed concern that the draft standard was not specific enough for portable gasoline containers (gas cans). The draft standard does not address the issues related to multiple opening sites that are associated with all gas cans. These include an opening for filling (fill port), a spout to facilitate pouring, and a vent which some cans may have. In some designs, the spout can be stored inside the gas can.

The test procedures outlined in the draft standard do not describe how to test a package with multiple openings for either the child or adult test protocols. CPSC staff is aware that in several tests of gas cans, all of the openings were tested together in a single test with children while each opening was tested separately with adults. The CPSC technical staff recommends the opposite for testing gas cans, that is, the children would test each opening separately and the adults would test the gas can openings together in a single test.

CPSC Hotline: 1-800-638-CPSC(2772) ★ CPSC's Web Site: <http://www.cpsc.gov>

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EXCEPTED BY: PETITION  
RULEMAKING ADMIN. PROCDS  
WITH PORTIONS REMOVED.

The CPSC technical staff believes that the best approach for measuring child-resistance of gas cans is to test each of the openings separately when testing with children. This will assure that all of the gas can openings function in a "child-resistant" manner. Without data to demonstrate that the same level of protection is afforded by the gas can if the openings are tested together as when tested separately, the CPSC staff believes that testing the openings separately is the most appropriate way to test gas cans for child-resistance.

As stated in the comments of April 7, 2003, the technical staff believes that before a gas can can be considered to be "child-resistant," all closures and potential access ports for gasoline need to be tested. This includes the spout that could be stored within the can but may be left in place by the consumer. The staff also believes that for torque-dependent closures, the torque applied to closures prior to child testing gas cans should be related to the application torque values that are generated by adults following usage of gas cans, rather than the artificially high torque values identified in F 2234-03 for the leak test or other standards.

In the comments of April 7, 2003, the CPSC technical staff expressed concern that gas cans that pass a test with high "senior adult use effectiveness" may be likely candidates for intentional defeat in the home because more time was allotted for the test than would be acceptable for actual usage. During testing, adults were given separate 5-minute/1minute test periods to open and close each of the gas can's opening features. In order to determine if a gas can is able to be used properly by adults, the technical staff recommends that the adults open and resecure all of the openings within the same test. The CPSC staff acknowledges that additional testing and observation of adults may be necessary to determine the appropriate time periods for testing gas cans. In the interim, the manner in which the testing is to be conducted should be specified precisely.

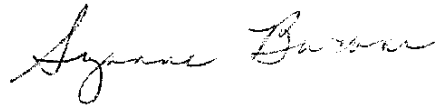
The staff also commented on durability in our previous comments. The draft standard states that the child-resistant containers shall continue to function at the specified effectiveness for the number of openings and closings customary for their size and contents and that this can be accomplished by using technical evaluations. However, there is no additional guidance in the draft standard on how to accomplish this. We believe that this portion of the draft voluntary standard is inadequate and should at a minimum define estimates for numbers of openings and closings that would be customary for gas cans. For example, if it is anticipated that a gas can is opened once per week for its five-year lifetime 260 openings could be used as a baseline for what is customary. In addition, the gas cans should be preconditioned to simulate the expected weathering and aging effects. We still recommend that the best way to demonstrate that the child-resistant mechanism functions after a specified number of openings and closings and weathering and aging is to conduct the child test protocols with gas cans that have been preconditioned.

As stated earlier, the CPSC staff believes strongly that the draft standard should not be finalized in its current state. I hope this letter answers your questions about our

previous comments. We would like to work with the Subcommittee to address these issues about the test methods.

The comments discussed above are those of the staff and they have not been reviewed or approved by the Commission. Please contact me if you have questions about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne Barone".

Suzanne Barone, Ph.D.

Encl.