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U.S. CONSUMER PRODUCT SAFETY COMMISSION  
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May 26, 2005

Mike Adams  
Chairman, ASTM F15.10

RE: Determination of Child-Resistance of Portable Fuel Containers for Consumer Use (Draft revised on May 10, 2005).

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 a request to review a revised draft standard specification of child-resistance of portable gasoline containers intended for consumer use dated May 10, 2005.

The revised standard addresses the major comments related to the child and adult test procedures the CPSC staff expressed in past correspondences. The CPSC staff supports the balloting of the draft standard. However, the staff has several suggestions.

Section 3.1.5.1 states, "Child-resistant effectiveness of not less than 85%, without a demonstration and not less than 80% after a demonstration of the proper means of opening of each and every closure of the container." The phrase, "when 200 children are tested per closure" should be added to the end. The standards are higher if fewer children are tested as indicated in Table 1 of the draft standard.

Section 5.2 of the standard was modified to include the size of the closures for the screening procedures, an omission that was pointed out by the CPSC staff in comments dated April 25, 2005. The revised standard specifies closures of 28 mm in diameter. The CPSC staff continues to believe that conventional (non-CR) gas containers, which have closures that are larger than 28 mm, should be used for the screening of adults who do not open the gas cans. 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. The size of the closures may be a consideration with the proper use of gas cans.

Please contact me if you have questions.

Sincerely,

/s/

Suzanne Barone, Ph.D.

**Barone, Suzanne P.**

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**From:** Barone, Suzanne P.  
**Sent:** Thursday, May 26, 2005 4:35 PM  
**To:** 'Morgan, Katharine'  
**Cc:** MADAMS@BLITZUSA.COM; blairj22@comcast.net  
**Subject:** RE: Revised Document for Review



comments on  
05-10draft.doc (68..

Kathie,

Attached, please find comments from the CPSC staff concerning the May 10, 1005 draft of the draft standard for the determination of child-resistance of portable fuel containers for consumer use. Please contact me if you have any comments.

Suzanne

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-----Original Message-----

**From:** Morgan, Katharine [mailto:kmorgan@astm.org]  
**Sent:** Tuesday, May 10, 2005 3:36 PM  
**To:** edbev.saylor@toast.net; gbhint@aol.com; roland.riegel@us.ul.com;  
jevans@theplasticsgroup.net; efostro@aol.com; jferguson@scepter.ca; Barone, Suzanne P.  
**Cc:** MADAMS@BLITZUSA.COM; blairj22@comcast.net  
**Subject:** Revised Document for Review

**TO:** Members that provided feedback on F15.10(05-01) Subcommittee Letter Ballot

Following the close of the subcommittee ballot on the new Specification for Determination of Child Resistance of Portable Fuel Containers for Consumer Use, Mike Adams and John Blair worked with negative voters and commenters to re-work portions of the document.

Attached is modified draft that is being circulated to those that provided feedback on the last ballot. Please review and see if your concerns have been addressed. Send any comments to me (kmorgan@astm.org) by May 28th. If the feedback is positive, we will likely proceed to letter ballot. If not, and significant issues still remain, a meeting will likely be planned.

Thanks for your assistance,  
Kathie Morgan

Katharine E. Morgan  
ASTM International  
General Manager  
Technical Committee Support