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

Suzanne Barone, Ph.D.
Project Manager for Poison Prevention
Division of Health Sciences

Tel: 301-504-7256
Fax: 301-504-0079
email: sbarone@cpsc.gov

Via e-mail

November 10, 2005

Mike Adams
Chairman, ASTM F15.10

RE: F 2517-05

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 these comments in response to a telephone conversation with John Blair on September 23, 2005, about the final specification for the determination of child-resistance of portable fuel containers intended for consumer use, approved by ASTM on September 1, 2005. The CPSC staff has reviewed the final version of F 2517-05. We were surprised to learn that the "teeth command" was eliminated from the final version in response to a negative vote by Mr. Peter Davis, dated August 10, 2005. We obtained a copy of Mr. Davis' comments with the ballot closing report on the ASTM website. The negative votes were not discussed at the subcommittee level prior to the approval of the standard by ASTM.

The CPSC staff believes that deleting the teeth command is more substantial than a minor edit. The purpose of this test is to make sure that portable fuel containers are child-resistant in real life settings. In real life, children use their teeth to open containers. Many of the primary closures on gas cans have a large diameter that would not permit children to use their teeth. However, the spout and vent openings on some gas cans are small enough to permit the use of teeth. Since a child could use his/her teeth in a real life setting to gain access to these smaller openings, but may not in a test setting, the CPSC staff continues to believe that the teeth command is a necessary part of the test protocol for child-resistance.

We noticed that one of the negative votes related to the screening containers. The CPSC staff commented previously that we believe that conventional (non-CR) gas containers should be used for the screening of adults, since the purpose of the screening is to make sure that child-resistant gas cans are not being tested by people who are unable to use conventional gas cans. This was not amended in the final version of the standard.

Please contact me if you have questions.

Sincerely,

/s/

Suzanne Barone, Ph.D.

cc: Kathie Morgan

Barone, Suzanne P.

From: Barone, Suzanne P.
Sent: Thursday, November 10, 2005 8:18 AM
To: 'Mike Adams'; 'Morgan, Katharine'
Cc: Church, Colin B.
Subject: F 2517-05

Mike and Kathie,

The staff of the US Consumer Product Safety Commission has reviewed the final portable fuel container standard (ASTM F2517-05) and provides the attached comments.

Thanks,

Suzanne

Suzanne Barone, Ph.D.
Project Manager for Poison Prevention
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