LOG OF MEETING

SUBJECT: ASTM F15.10 Subcommittee meeting on portable gasoline containers

DATE OF MEETING: January 14, 2004

PLACE: Underwriters Laboratories, Northbrook, IL.

LOG ENTRY SOURCE: Suzanne Barone, Ph.D., Pharmacologist, HS 3 (2/23/04)

COMMISSION REPRESENTATIVES: Suzanne Barone, Ph.D. and Kate Sedney

NON-COMMISSION REPRESENTATIVES: See attached sheet.

SUMMARY OF MEETING:

The ASTM subcommittee is trying to convert PS 119-01 provisional standard on child-resistant portable gasoline containers to a full consensus standard. The provisional standard adopted the language found in the regulations of the Poison Prevention Packaging Act. The CPSC staff commented that the standard needed to be written more specific to gas cans which have multiple openings. Specific comments on various parts of the test method were given. In addition to CPSC staff suggestions, there were several negative votes by F15 Committee members. The purpose of the meeting was to come to resolve the negative votes. Several testing issues were resolved. The child-resistant mechanisms should function for the life of the gas can. Issues involving how to prepare the samples before child-testing to simulate wearing were not resolved. Several people including CPSC staff volunteered to meet via conference call to discuss these issues further.

A copy of the meeting minutes from the ASTM Subcommittee Chairman is attached.
Below are the minutes of the recent Subcommittee meeting in Chicago, IL as prepared by Chairman, Ron Raboin.

January 27, 2004

Memo to: ASTM F15.10 Subcommittee

From: Ron Raboin

RE: Minutes - Subcommittee Meeting of January 14, 2004

Opening
Meeting called to order at 9:40 AM at Underwriters Laboratories, Inc. Northbrook, IL

Self Introductions
Present: Chuck Craig, Blitz, USA; Larry Chrisco, Blitz, USA; Mark Pierce, No Spill Research; Roland Riegel, UL; Phil Moncton, Scepter Corp.; John Ferguson, Scepter Corp.; John Trippi, Midwest Can; Suzanne Barone, USCPSC; Kate Sedney, USCPSC; Efrem Ostronsky, consultant; Tim Crews, UL; John Evans, Wedco; Ron Raboin, Chilton Products; Steve Whitehead, Fluoro-Seal.

Agenda Approval
Agenda approved without change.

Brief discussion concerning purpose and scope of meeting. Review of hand out documents related to topics to be discussed.

Minutes of the November 29, 2001 Meeting Approval
Minutes approved.

Technical Issues

PS 119-01 Provisional Standard on Child Resistant Portable Gasoline Containers

General discussion:

The general discussion primarily expanded on the negatives and comments resulting from the February 2003 ballot, issued to advance the Standard’s provisional status to full consensus. The principal issues and recommendations can be summarized as follows:

(a) The Standard allows testing a gasoline can with multiple closures in the same manner as a single trip, prepackaged container with a single closure such as a medicine bottle. This is considered to be inadequate primarily because with multiple closures, the child’s attention would not necessarily be focused on a single closure, therefore, a child’s effort applied to open a single closure may not span the full 5 minute test periods. Child testing each closure separately and requiring seniors to properly open and close all closures within a single test is recommended to help assure the container functions in a “child resistant” manner.
(b) The Standard does not describe the means to determine chemical resistance, weatherability, effects of temperature, effects of aging and durability of the closures. Portable gasoline cans are intended for continuous use, thus the factors associated with the expected number of opening and closing cycles should be addressed in the Standard. Including applicable sections of F-2234-03 in the Standard defining test procedures and acceptance criteria for these factors is recommended to help assure the closures retain child resistant effectiveness in foreseeable use conditions over the useful life of the container.

(c) The Standard does not specify values for securing torque dependent closures. Proper application of the closures is critical to the measurement of child resistance effectiveness. It is recommended that established values for application torque based on closure design as specified by the Closure Manufacturers Association or other recognized sources are included in the Standard. To allow for any relaxation of gasket materials that may be used, it is also recommended that the procedures specify setting the closures to the appropriate torque 72 hours prior to testing.

The members in attendance are generally in agreement with the recommendations. However, referring to (b) a concern remains relative to the use of "conditioned" closures for CR testing. Subjecting the parts to conditions simulating outdoor weathering, fuel exposure, temperature variations, etc. followed by durability cycling as outlined in F-234 would render the parts unifit for handling by children. Without actual child experience with the "conditioned" parts, CR effectiveness may be questionable. To resolve this issue, R Raboin will outline proposals intended to achieve an equal or near equal level of assurance of CR effectiveness as would be determined by actual child testing. The proposals to be considered by a task group consisting of Raboin; J. Ferguson; C. Craig; J. Evans; S. Barone; E. Ostrowsky; & R. Reigle. A phone conference will be arranged the week of February 8th for this discussion.

The editorial changes recommended by James Ryan were also discussed. There were no objections.

Moving forward, when the issue regarding testing for CR effectiveness of conditioned and cycled parts is resolved by the task group, the Provisional Standard is to be revised in accordance with the above recommendations and resubmitted for concurrent Subcommittee and Main Committee balloting.

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F 2234-03 Standard on Portable Gasoline and Kerosine Spill Resistant Fueling Systems

This Standard was published as a full consensus document in July 2003. The Standard covers Class A and B systems, the latter classification intended for systems meeting specific requirements of the California ARB regulatory model. In recent months ARB has indicated interest in incorporating F 2234 procedures into its certification program. To do so, ARB requires certain modifications to F 2234 [test] methods to meet what they describe as more stringent performance standards than now specified.

At the outset of work on this Standard, it was a primary goal to develop a specification acceptable to California and thus, any additional states that may follow. The same is true today. ARB has agreed to work with ASTM in this effort. A task group consisting of representatives from UL; Blitz; Midwest Can; Scepter; No Spill Research; Wedco; Chilton and Fluoro-Seal has been appointed. Phil Monckton of Scepter has agreed to lead this process.

ARB is planning another workshop in March to consider this issue further. A task group meeting or joint phone discussion including an ARB representative may be helpful to identify the major issues prior to the work shop. Phil Monckton will advise.

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Joland Reigel of UL requested the Subcommittee consider whether revisions to F 852 are necessary to provide for containers designed for oil-gas mixtures or, containers that consist of two separate compartments for storage of gas and oil. In discussion, it was
pointed out that P 852 does not distinguish fuel blends such as alcohol/gasoline mixtures or any performance additives that may be used. The severity of chemical tests specified for elastomers and other container materials is intended to exceed the harmful effects of the substances typically used with gasoline. Twin compartment fuel containers tested to P 852 requirements have been in use for many years. Although it is not stated in the Standard, in these cases each compartment is considered as a container and must comply with all requirements. The Subcommittee should determine whether a statement to this effect is added to Section 1 of the Standard.

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The meeting was adjourned at approximately 2:30 PM.

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