



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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TRANSMITTED VIA EMAIL

Susan Eppes
ANSI Z245.30 Subcommittee Chair,
Container Safety
1550 Crystal Dr., Suite 804
Crystal City, VA 22202

Dear Ms. Eppes,

CPSC staff¹ is aware of 45 incidents involving 95/96-gallon roll-out trash cans that occurred within the period 2006 to present. At least 20 incidents occurred when consumers pushed the cart with the lid open, and stepped/tripped on the lid, fell forward into the cart, and sustained serious injuries. Most of the injuries involved facial injuries requiring seven to 40 stitches. Other injuries involved concussions, spine injuries, and nasal and scalp repair surgery.

Currently, ANSI Z245.30, *Equipment Technology and Operations for Wastes and Recyclable Materials - Waste Containers - Safety Requirements*, contains a requirement that the lids shall be marked with a statement, such as: "CLOSE LID BEFORE MOVING." However, ANSI Z245.30 does not contain any requirements for a signal word, such as: WARNING, a statement of hazard or consequence or other warning label-related components, such as use of contrasting color that may attract consumers' attention and motivate them to comply with the warning. Staff believes these factors can be addressed by considering ANSI Z535.4, *Product Safety Signs and Labels*, when developing a warning.

Therefore, CPSC staff requests that the ANSI Z245.30 *Subcommittee on Container Safety* form a task group to consider adding a signal word, statement of hazard and consequence to strengthen the warning requirements to reduce the potential for future incidents. Other requirements to address these incidents may also be considered.

¹The views or opinions expressed in this letter are solely those of the staff, and these views and opinions do not necessarily represent those of the Commission.

If you have any questions or need additional information, you may contact me at swhite@cpsc.gov or (301) 987-2562.

Sincerely,

Sharon R. White

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cc: Kirk Sander, Secretary, National Waste & Recycling
Association
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