TO: Joint Committee on Wastewater Technology
FROM: Dr. Robert W. Powitz, Chair of the Joint Committee
DATE: February 18, 2020

SUBJECT: Proposed revisions to
NSF/ANSI 40 — Residential Wastewater Treatment Systems (40i35r2)
NSF/ANSI 245 — Residential Wastewater Treatment Systems – Nitrogen Reduction (245i17r2)
NSF/ANSI 350 — Onsite residential and commercial, water reuse treatment systems (350i48r2)

Revision 2 of NSF/ANSI 40, issue 35, revision 2 of NSF/ANSI 245 issue 17, and revision 2 of NSF/ANSI 350 issue 48 are being forwarded to the Joint Committee for consideration. Please review the proposal and submit your ballot by March 10, 2020 via the NSF Online Workspace <www.standards.nsf.org>.

When adding comments, please identify the section number/name for your comment and add all comments under one comment number where possible. If you need additional space, please upload a word or pdf version of your comments online via the browse function.

Purpose

The purpose of this ballot is to incorporate language clarifying the term “specialized tools”.

Background

Auditors have interpreted “specialized tools” to mean that if access ports are secured using screws they are to be secured with some screw head configuration other than ones which may be removed using tools typically found in a home tool assortment (and assumed to therefore be easily accessed by children) such as a slot or Phillips-head screwdriver. The problem here is that auditors are left to interpret standard language and applying their interpretation in performance of field audits.

This issue paper was presented at the 2018 Wastewater Technology Joint Committee meeting and was motioned to be sent to the WWT Task Group on Access ports, which discussed this topic during an April 9, 2019 teleconference. An r1 straw ballot drew some comments, which were discussed during a 7-9-19 Task Group call. The group agreed to try a different approach, by defining the term security fastener. This method is used in other NSF/ANSI Standards. The r2 language was approved by the Task Group and is now being presented to the Joint Committee for consideration.

Please note that while the group did discuss additional safety measures that may be incorporated into access ports, the focus of this ballot is only on the highlighted / strikethrough language. A separate issue paper (WWT-2019-6 — access ports) was submitted to charge the group with looking into secondary containment requirements and was sent to the Task Group by motion of the JC at its 2019 meeting.
If you have any questions about the technical content of the ballot, you may contact me in care of:

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3 Definitions

3.XX security fastener: A specifically designed fastener that requires a tool other than a slotted or Philips driver for installation or removal.

5.7 Access ports

5.7.1 The system shall be demonstrated to have ground-level access ports that are sized and located to facilitate the installation, removal, sampling, examination, maintenance, and servicing of components and compartments that require routine maintenance and inspection.

The ground-level access ports shall be of sufficient size and located so as to allow for the following:

— visual inspection and removal of all mechanical or electrical components;

— periodic cleaning or replacement of components and removal of residuals as required by the manufacturer in the operations and maintenance manual;

    NOTE — Periodic refers to all procedures specified in the manufacturer’s operation and maintenance manual that must be performed within intervals of two years.

— visual inspection and sampling as required by the manufacturer in the operations and maintenance manual, including a means for collecting a representative effluent sample and determining the need for residuals removal; and

— removal (manually or by pumping) of collected residuals as required by the manufacturer in the operations and maintenance manual. If the operations and maintenance manual describes a means to
determine the need to remove residuals from a chamber without ground-level access, then only the ability to install ground-level access shall be required. Systems without ground-level access to a chamber shall be equipped with a means to locate the opening to the chambers. This information shall be provided on or in a ground-level access opening.

5.7.2 Access ports shall be protected against unauthorized intrusions. Acceptable protective measures include, but are not limited to:

- a padlock;
- a cover that can be removed only with specialized tools installed using security fasteners; or
- a cover having a minimum net weight of 29.5 kg (65 lb).

Rationale: incorporate language clarifying the term “specialized tools”.

NSF/ANSI Standard for Residential Wastewater Treatment Systems – Residential Wastewater Treatment Systems – Nitrogen Reduction

3 Definitions

3.XX security fastener: A specifically designed fastener that requires a tool other than a slotted or Philips driver for installation or removal.

5 Design and construction

5.7 Access ports

1.1.1 5.7.1 The system shall be demonstrated to have ground-level access ports that are sized and located to facilitate the installation, removal, sampling, examination, maintenance, and servicing of components and compartments that require routine maintenance and inspection.

The ground-level access ports shall be of sufficient size and located so as to allow for the following:

- visual inspection and removal of all mechanical or electrical components;
- periodic cleaning or replacement of components and removal of residuals as required by the manufacturer in the operations and maintenance manual;
NOTE — “Periodic” refers to all procedures specified in the manufacturer’s operation and maintenance manual that must be performed within intervals of 2 y.

— visual inspection and sampling as required by the manufacturer in the operations and maintenance manual, including a means for collecting a representative effluent sample, determining the need for residuals removal and determining the need for replenishing treatment chemicals (if required); and

— removal (manually or by pumping) of collected residuals as required by the manufacturer in the operations and maintenance manual. If the operation and maintenance manual describes a means to determine the need to remove residuals from a chamber without ground-level access, then only the ability to install ground-level access shall be required. Systems without ground-level access to a chamber shall be equipped with a means to locate the opening to the chambers. This information shall be provided on or in a ground-level access opening.

5.7.2 Access ports shall be protected against unauthorized intrusions. Acceptable protective measures include, but are not limited to:

— a padlock;
— a cover that can be removed only with specialized tools installed using security fasteners; or
— a cover having a minimum net weight of 29.5 kg (65 lb).

Rationale: incorporate language clarifying the term “specialized tools”.

NSF/ANSI Standard
For Wastewater Technology –

Onsite Residential and Commercial Water Reuse Treatment Systems

3 Definitions

3.XX security fastener: A specifically designed fastener that requires a tool other than a slotted or Philips driver for installation or removal.

5 Design and construction

5.7 Access ports
5.7.1 The system shall be demonstrated to have access ports that are sized and located to facilitate the installation, removal, sampling, examination, maintenance, and servicing of components and compartments that require routine maintenance and inspection. Systems installed below grade shall include ground level access ports.

The access ports shall be of sufficient size and located so as to allow for the following:

— visual inspection and removal of all mechanical or electrical components;
— periodic cleaning or replacement of components and removal of residuals as required by the manufacturer in the operation and maintenance manual;

NOTE — Periodic refers to all procedures specified in the manufacturer’s operation and maintenance manual that must be performed within intervals of two years.
— visual inspection and sampling as required by the manufacturer in the operation and maintenance manual, including a means for collecting a representative effluent sample and determining the need for residuals removal;
— removal (manually or by pumping) of collected residuals as required by the manufacturer in the operation and maintenance manual; and
— removal of stored treated or untreated reuse water.

5.7.2 Access ports shall be protected against unauthorized intrusions by methods compatible with the size of the access port. Acceptable protective measures for access ports that allow personal entry include, but are not limited to:

— a padlock;
— a cover that can be removed only with specialized tools installed using security fasteners; or
— a cover having a minimum net weight of 29.5 kg (65 lb).

Rationale: incorporate language clarifying the term “specialized tools”.