TO: Joint Committee on Drinking Water Additives – Treatment Chemicals

FROM: France Lemieux, Chair of the Joint Committee

DATE: March 20, 2020

SUBJECT: Proposed revision to NSF/ANSI/CAN 60 – Drinking Treatment Chemicals- Health Effects (60i86r1)

Revision 1 of NSF/ANSI/CAN 60 issue 86 is being forwarded to the Joint Committee for consideration. Please review the proposal and submit your ballot by April 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 proposed revision will add language to clarify requirements for the application of tamper-evident seals in Section 3.9.3.1.

Background

In Section 3.9 of Standard 60 (Product Security), large reusable chemical totes (totes containing volumes > 1000L) are classified as bulk shipments. Section 3.9.3 addresses “Security requirements for bulk shipments and large reusable containers (totes)”, whereby product security compliance may be achieved through meeting the criteria listed in Section 3.9.3.1 (tamper-evident seals), Section 3.9.3.2 (chain-of-custody), or Section 3.9.3.3 (alternative method).

NSF has received requests for clarity, with respect to the requirements for application of tamper-evident seals (Section 3.9.3.1). As railcars and tank trucks (used for chemical deliveries) have multiple chemical ports/openings, seals used for railcar/tank truck deliveries are required to be uniquely numbered and disclosed on documentation provided to the purchaser/end user. This unites the seal numbers for a single shipment of a chemical delivery vessel with multiple ports. Separately, totes are generally designed with a single chemical outlet (and not multiple ports), and often are warehoused at multiple locations en route to the end user. It is, therefore, recommended that 3.9.3.1 be updated so as to provide a separation in the sealing requirements for tote shipments versus railcar/tank truck shipments.

This issue was presented at the 2019 DWA-TC JC meeting and was unanimously approved for balloting. Please refer to the 2019 JC meeting summary excerpt and the PowerPoint presentation under the referenced items for additional information.
If you have any questions about the technical content of the ballot, you may contact me in care of:

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3.9 Product security

3.9.3 Security requirements for bulk shipments and large reusable containers (totes)

Drinking water treatment chemicals shipped in bulk\(^1\) shall be secured during storage and distribution by employing one or more of the following security measures (see Sections 3.9.3.1, 3.9.3.2, and 3.9.3.3). These requirements are applicable to a single load delivered to one or to multiple locations\(^2\). This requirement applies to railcar chemical deliveries that are direct to drinking water utilities, or to other end users involved in the addition of the delivered chemical to drinking water, and to truck deliveries whether to a single destination or by milk run deliveries.

3.9.3.1 Tamper-evident seals.

Containers used for bulk shipments shall have tamper protection provided at all openings capable of loading or unloading chemicals. Vents shall have tamper protection provided, unless they are protected by construction that makes them incapable of receiving chemicals. Bulk containers may be sealed with a uniquely numbered, nonreusable tamper-evident seal, or a tamper-evident seal which contains a unique company identifier or logo, on each opening in the container. If tamper-evident seals are used, the seals shall remain in place until removed at the point of delivery. Seal numbers, or the unique company identifier or logo, shall be recorded and disclosed on shipping documents provided to the purchaser at the time of delivery and kept available for review by the certification body. If tamper-evident seals are used in milk run deliveries, a new seal shall be applied after each partial off-loading and noted in the consignment records after each partial delivery.

\(^1\) The term “bulk” is used for shipments being transported in a container having a volume of more than 1,000 L and applies to containers holding solid, liquid, and gaseous products. Such containers can be multi-modal containers, tank trucks, or tank cars appropriate to the physical characteristics of the product being transported.

\(^2\) Multiple destination shipments are referred to as “milk run deliveries”.

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[Note – the recommended changes to the standard which include the current text of the relevant section(s) indicate deletions by use of strikeout and additions by gray highlighting. Rationale statements are in \textit{italics} and only used to add clarity; these statements will NOT be in the finished publication.]
Rationale: Clarified the requirements for application of tamper evident seals, specifically for railcars and tank trucks, per 2019 DWA-TC JC meeting discussion (Dec. 4, 2019).