NSF International

Joint Committee Correspondence

TO: Joint Committee on Drinking Water Additives – NSF 61

FROM: Jon DeBoer, Chairperson of the Joint Committee

DATE: January 3, 2012

SUBJECT: Proposed revision to NSF/ANSI 61, *Drinking Water System Components – Health Effects*

Enclosed is the ballot for NSF/ANSI 61, issue 97, revision 1, regarding formulation requirements. Please review the proposal and return your ballot **by the ballot due date of January 24, 2012** via the NSF online workspace (http://standards.nsf.org).

Purpose

The proposed ballot reduces the formulation information required for components of mechanical devices and mechanical plumbing devices that are composed from materials that are less than or equal to 2.0 sq inches per liter and listed in Table 3.1 Material-specific analyses.

Background

With the exception of coatings and process media, NSF has not encountered contaminants that would be outside of the minimum test batteries of NSF 61, Table 3.1, for materials that have water contact surface areas that are 2.0 square inches per liter or less.

Increasing complexity in supply chains has increased the difficulty in obtaining complete formulation information for very small parts in devices. It has become impractical to require this full formulation information when it does not change what tests are conducted.

This ballot proposal is to revise Section 3 of NSF 61 to remove the requirement for 100% formulation information for component materials of Mechanical Devices and Mechanical Plumbing Devices that are:

1) listed in Table 3.1, and
2) have a diluted surface area of less than or equal to 2.0 square inches,
3) with the exception of coatings and process media.

These component materials shall be required to be tested to the complete test batteries listed in Table 3.1.

The issue was discussed at the 2011 DWA Joint Committee meeting (December 1, 2011) and was unanimously voted in favor of sending the proposed revision to ballot. Please see the attached 2011 DWA JC meeting summary excerpt and the associated issue paper (DWA 61-2011-1) for additional information.

Public Health Impact

This revision will not have any impact on the public health safety requirements of NSF 61.

If you have any questions about the technical content of the ballot, you may contact me in care of:

Jon DeBoer, Chairperson,
Joint Committee on Drinking Water Additives – System Components
c/o Joint Committee Secretariat, Monica Leslie
NSF International
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[Note – the changes are seen below using strikeout for removal of old text and gray highlights to show the suggested text. ONLY the highlighted text is within the scope of this ballot.**]**

NSF/ANSI Standard
for Drinking Water System Components – Health Effects

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3 General requirements

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3.2 Information and formulation requirements

The following information shall be obtained and reviewed for all materials with a water contact surface to determine the appropriate analytical testing and to ensure that the potential health effects of products and materials are accurately and adequately identified:

– the product section(s) under which the product, component, or material is covered and the intended function or end use of the product or the material;

– for assemblies, sub-assemblies, products or components, a list of all materials and their corresponding surface areas that come into direct contact with water;

– when appropriate, the total volume of water that the product can hold when filled to capacity;

– the expected service life of the product;

– the anticipated minimum, maximum, and average volumes of water that come into contact with the product, component, or material during a 24-h period.

– complete formulation information (equal to 100.0%) for each water contact material. This shall include:

NOTE 1 – The complete formulation information may be omitted for a component material, if the generic material type is contained in Table 3.1 and:

– its diluted surface area in the application is less than or equal to 0.001 in^2/L or 0.0001 in^2/L for static or flowing conditions respectively or,

– if the material is in a high flow device exclusively used at public water treatment facilities. For the purposes of this section high flow devices are limited to chemical feeders, disinfectant generators (e.g. chlorine dioxide, hypochlorite, ozone and ultraviolet), electrodialysis technologies, microfiltration technologies, reverse osmosis and ultrafiltration technologies, or.

– if (1) used in a mechanical device or mechanical plumbing device and (2) the diluted surface area of the component material is less than or equal to 2.0 square inches per liter and (3) the material is not a coating, and (4) the component is not a process media.

If the product is to be considered compliant to a lead content standard, the lead content (percent by weight) and wetted surface area of each component that comes into contact with the direct flow of water under the normal operation of the product is required. Complete documentation shall be submitted in accordance with the Annex G (NSF/ANSI 372 – Drinking water system components – Lead content).

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3.3 Identification of analytes

For all products and materials, the formulation information required in 3.2 shall be reviewed for completeness (e.g., all formulations total 100.0%), and to determine whether a minimum test battery has been established for each water contact material (see Table 3.1). In addition to selecting the minimum testing parameters decribed in Table 3.1, a formulation review to identify any formulation-dependent analytes shall be performed for all water contact materials (see 3.3.1).

In instances where complete formulation has not been obtained for a material that is $\leq$ 2.0 square inches and used in a component of a mechanical device or mechanical plumbing device as allowed through Note 1 of Section 3.2, testing shall include the material specific analyses in Table 3.1.

Reason: Revised per 2011 DWA JC annual meeting (December 1, 2011) discussion that NSF has not encountered contaminants that would be outside of the minimum test batteries of NSF 61, Table 3.1, for materials that have water contact surface areas that are 2.0 square inches per liter or less.