NSF International

MEMORANDUM

TO: Joint Committee on Drinking Water Additives – System Components

FROM: France Lemieux, Chairperson

DATE: September 12, 2013

SUBJECT: Proposed revision to NSF/ANSI 61 – *Drinking water system components- Health Effects* (61i105)

Draft 2.1 of NSF/ANSI 61 issue 105, is being forwarded to the Joint Committee for balloting. Please review the changes proposed to these standards and **submit your ballot by September 25, 2013** via the NSF Online Workspace.

Purpose

The proposed revision will clarify the lead use restrictions under section 3.5 of NSF/ANSI 61 to correspond to the provisions specified in the US Safe Drinking Water Act.

Separately, the requirements of Annex G have been removed as previously balloted by the DWA-SC in October 2010 (*not* part of this ballot, but the revised informative Annex G has been included in the draft for your information).

Revision 2.1 incorporates a suggestion to clarify that the exemption under the third bullet in section 3.5 is for **brass or bronze used in** products specifically identified as exemptions within section (a)(4)(B) of the Safe Drinking Water Act of the United States.

Please note that if you do not return a vote for this revised ballot, your last recorded vote from the previous draft revision will remain in effect.

Background

The procedures for determining the lead content of drinking water system components were removed from NSF/ANSI 61 Annex G and reestablished in NSF/ANSI 372. At the same time, it was determined by ballot that Annex G was to be retired from NSF/ANSI 61 three years after the initial adoption of NSF/ANSI 372. That standard was first adopted in October of 2010 bringing the end of the three year period later this year.

Separate from Annex G, Section 3.5 of NSF/ANSI 61 restrict the use of lead as an intentional additive in most products covered by the standard. One of the exceptions is its use in brass or bronze containing products and in that instance requires compliance with the definition of 'lead free' under the specific provisions of the US Safe Drinking Water Act (SDWA). As the definition of 'lead free' within the SDWA is due to require compliance with a maximum weighted average lead content of 0.25%, this proposed revision recommends that the reference to NSF/ANSI 372 remain in that section to denote how the evaluations are to be performed.

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

Chairperson, Joint Committee
c/o Monica Leslie
Joint Committee Secretariat

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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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3.5 Restrictions on use of lead containing materials

There shall be no lead added as an intentional ingredient in any product, component, or material submitted for evaluation to this standard, with the following exceptions:

– Brass or bronze used in products meeting the definition of "lead free" under the specific provisions of the Safe Drinking Water Act of the United States.

– Solders and flux meeting the definition of "lead free" under the specific provisions of the Safe Drinking Water Act of the United States.

– Brass or bronze used in ~~P~~products specifically identified as exemptions within section (a)(4)(B) of the Safe Drinking Water Act of the United States.

– Trace amounts required for operation of products used to monitor the characteristics of drinking water, such as the glass membranes used with some selective ion or pH electrodes.

– Materials of components with a diluted surface area less than or equal to 0.0001 in^2/L.

NOTE – To the maximum extent possible, lead should not be added as an intentional in any product covered by the scope of this standard. The exception above relative to the diluted surface area has only been included in recognition of the formulation information exemption for applications of this condition.

Reason: Clarifying language added for instances where brass or bronze is used. Solder and flux addition clarifies that that not only that lead shall not be added as an intentional additive, but that they also comply with the SDWA. Addition of the item on specifically exempted products under the SDWA clarifies that the same is in effect in this section.

3.6 Weighted average lead content of products

Products being evaluated for weighted average lead content shall be performed in accordance with ~~Annex G (~~NSF/ANSI 372 – Drinking Water System Components – Lead Content~~)~~.

Reason: Removing reference to Annex G as it is being retired from NSF/ANSI 61. Use of NSF/ANSI 372 is still needed to verify compliance with the 1st bullet item above.

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[Please note: The following is not part of this ballot and is included for informational purposes only.]

Annex G

(informative~~normative~~)

Weighted average lead content evaluation procedure to a 0.25% lead requirement

The procedures for determining the lead content of drinking water system components were removed from NSF/ANSI 61 Annex G and reestablished in NSF/ANSI 372. Annex G was retired from NSF/ANSI 61 in October 2013 (i.e., three years after the initial adoption of NSF/ANSI 372 as outlined in Annex G).

~~G.1 General~~

~~This is an optional evaluation method for products that need to meet a 0.25% weighted average lead content standard. Certification of products to this annex shall be noted in the certification listing.~~

~~Products must first comply with the full requirements of NSF/ANSI 61 in order to be deemed compliant to this section.~~

~~G.2 General Evaluation Protocol~~

~~The evaluation for weighted average lead content shall be performed in accordance with NSF/ANSI 372: *Drinking water system components – Lead content*.~~

~~Note: The procedures for determining the lead content of drinking water system components were removed from NSF/ANSI 61 Annex G and reestablished in NSF/ANSI 372. Annex G is due to be retired from NSF/ANSI 61 three years after the adoption of NSF/ANSI 372.~~