MEMORANDUM

TO: Joint Committee on Drinking Water Additives – System Components

FROM: France Lemieux, Chairperson

DATE: January 21, 2014

SUBJECT: Proposed revision to NSF/ANSI 61 – *Drinking water system components-Health Effects* (61i110r1)

Draft 1 of NSF/ANSI 61 issue 110, is being forwarded to the Joint Committee for balloting. Please review the changes proposed to these standards and **submit your ballot by February 11, 2014** via the NSF Online Workspace.

Purpose

This revision will exclude fire sprinklers from the restriction of use of lead containing materials under section 3.5 of NSF/ANSI 61.

Background

At the 2013 annual DWA-SC JC meeting, it was proposed that while fire sprinklers currently meet the lead extraction testing under NSF/ANSI 61, they do not meet the no-lead requirement. Because fire sprinklers are not used to supply water for drinking, it was argued that they should be exempt from the no-lead requirement. It was also reported that the state of California issued an interpretation that fire sprinklers are not included in the list of products that must meet the no-lead requirements for the same reason. Upon discussion, there was agreement among the majority of members of the JC that it was more appropriate to add the exclusion under section 3.5 rather than the original proposed revision under section 9. Please see the attached 2013 DWA-SC JC meeting summary excerpt and the original issue paper (DWA-61-2013-13) 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:

Chairperson, Joint Committee
c/o Monica Leslie
Joint Committee Secretariat
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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3.5 Restriction 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 products specifically identified as exemptions within section (a)(4)(B) of the Safe Drinking Water Act of the United States.

- Fire sprinklers.

- 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 formulation information exemption for applications with this condition.

Reason: Residential fire sprinklers are installed in multipurpose piping systems in one and two family dwellings and townhouse as a part of the potable water distribution system. They are also installed in standalone systems that are piped in potable water piping material (complying with NSF 61) without any backflow preventer. Fire sprinklers are always at the end of the line, similar to a water closet connection or shower connection. They operate by opening in the event of a fire. As such, water does not continuously pass over a fire sprinkler.

The State of California was the first state to adopt the no-lead requirements. The state issued an interpretation that fire sprinklers are not included in the list of products that must meet the no-lead requirements. The state concluded that fire sprinklers are not used to supply water for drinking nor cooking. As such, they did not have to meet the no-lead requirements.

Similarly, the State of Maryland adopted the no-lead requirements prior to the Federal adoption. The State of Maryland, like California, mandates residential fire sprinklers in all residential buildings, including one and two family dwellings. Maryland has also interpreted their requirements as not applying to fire sprinklers.

Fire sprinklers have been listed to NSF 61 for many years. The sprinklers meet all the requirements including the lead limits. The sprinklers are not a contributor of contaminants to the drinking water in any adverse way.

This change will allow fire sprinklers to continue to be tested and listed to NSF 61.