

MEMORANDUM

TO: Joint Committee on Drinking Water Additives – System Components

FROM: France Lemieux, Chairperson

DATE: December 2, 2014

SUBJECT: Proposed revision to NSF/ANSI 61 – *Drinking Water Treatment Chemicals* – *System Components* (61i118).

Enclosed is an **adjudication ballot** for revision 1 of NSF/ANSI 61 issue 118 that is being forwarded to the Joint Committee for balloting. Please review the changes proposed to this standard and **submit your ballot by December 16, 2014** via the NSF Online Workspace.

This two-week ballot allows voters the opportunity to respond, change or reaffirm their vote based on the content of the comments contained herein. In the reference items for this ballot, included are the response letters to the comments from the 2 negative votes not resolved.

Voting options:

- 1. Affirmative: you are voting to accept the ballot document as it stands after your consideration of the unresolved negative comments.
- 2. Negative: You are voting to reject the ballot document as it stands after your consideration of the unresolved negative comments. Voters who change an affirmative to a negative shall cite the unresolved negative comment that caused their decision.
- 3. Abstain: You do not feel that you have sufficient information to make an informed decision on this issue.

Please note that if you do not return a vote in this adjudication ballot, your original vote will remain in effect.

At the close of this adjudication ballot, all results will be tallied to determine if the requirements for consensus have been satisfied.

Purpose

To remove the requirement under Section 3.2 *Information and formulation requirements* to specify a chemical constituent as an ingredient, a reactant, or a processing aid.

Background

Over time, detailed knowledge of the chemistry and manufacturing process for almost all materials has been accumulated. In the small number of circumstances where a question arises regarding whether a specific chemical is an ingredient, reactant, or processing aid (generally due to a manufacturing innovation), the technical staff reviewing the formulation are likely to also have questions about the manufacturing process. A conversation with the material manufacturer

provides more details than does simply denoting the constituent as an ingredient, reactant or processing aid.

Likewise, clients and suppliers frequently do not know or understand the difference between an ingredient, a reactant, and a processing aid. Therefore, the information provided to the technical staff for review may be incorrect.

Issues:

Negative votes were submitted by Dr. Irving Moch, Jr. and Brian Bernados. Please see the comments and response letters for each under the referenced items for additional information.

Public Health Impact

This revision will have no negative impact on public health.

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 Tel: (734) 827-5643

E-mail mleslie@nsf.org

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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:

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

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- a complete formulation shall result in the identity by CAS# or chemical name of each component of the formulation including but not limited to the activators, antioxidants, antimicrobials, co-solvents, fillers, initiators, peroxides, pigments, plasticizers, process aids, solvents, stabilizer, surfactants and terminators;
- percent or parts by weight for each chemical in the formulation or reference to a national or international standardized material specification for metallic materials (e.g. UNS copper alloy specifications);
- when the chemical composition of an ingredient or component cannot be determined based on the information submitted by the material supplier, the information shall be obtained by the certifier from the ingredient supplier prior to determining all formulation dependant analytes:
- the composition of the materials ingredients and their components shall be known to determine the identity of formulation specific analytes.
- an indication as to whether the chemical is an ingredient, reactant, or processing aid.

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- the maximum temperature to which the product, component, or material is exposed during its intended end use;

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Reason: It is suggested in issue paper # DWA 61-2013-18 that a conversation between the technical staff and the manufacturer would provide more details than simply denoting the constituent as an ingredient, reactant, or processing aid.

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