MEMORANDUM

TO: Joint Committee on Drinking Water Additives – System Components

FROM: France Lemieux, Chairperson

DATE: August 14, 2017

SUBJECT: Proposed revision to NSF/ANSI 61 – *Drinking water system components- Health effects* (61i137)

Draft 2 of NSF/ANSI 61 issue 137, is being forwarded to the Joint Committee for balloting. Please review the proposal and **submit your ballot by August 28, 2017** via the NSF Online Workspace.

Purpose

This ballot will update lead content requirements in Section 3.6 of NSF/ANSI 61.

Revision 2 addresses the comments received from the revision 1 ballot that high flow devices should not be exempted from lead content verification. **This two-week adjudication ballot** also addresses any unresolved negative comments that were received.

This ballot allows voters the opportunity to respond, change or reaffirm their vote based on the content of the comments contained herein.

Voting options:

1. **Affirmative: you are voting to accept the ballot document as it stands after your consideration of the revised draft and unresolved negative comments.**
2. **Negative: You are voting to reject the ballot document as it stands after your consideration of the revised draft and unresolved negative comments. Voters who change an affirmative to a negative shall cite the revision and/or 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 revised and adjudication ballot, all results will be tallied to determine if the requirements for consensus have been satisfied.

Background

Section 3.5 of NSF/ANSI 61 establishes a restriction on the use of lead containing materials. It states that there shall be no lead added as an intentional ingredient in any product, component, or

material submitted for evaluation, with several exceptions noted. None of the stated exceptions contradict the requirements of the US SDWA for 'lead free' plumbing.

Section 3.6 of NSF/ANSI 61 currently requires that when a weighted average lead content evaluation needs to be performed, that it's performed in accordance with NSF/ANSI 372. This issue paper proposes an update to Section 3.6 such that lead content verification is performed on all products as a means of an additionally verifying the intent of Section 3.5. Additionally, the change would provide additional assurance that products comply with the US SDWA.

Trying to align the scopes of the lead content requirements of NSF 61 with the scope of the US SDWA has proven difficult. This revision takes a simpler approach by requiring all products to have a weighted average lead content < 0.25% (Solders and fluxes remain < 0.2% lead) unless specifically exempted by the law. It also requires lead content testing for all products. This change will ensure that all products Certified to NSF/ANSI 61 have demonstrated compliance with the US SDWA.

Revision 2 removes the proposal under 3.6.1 to exempt high flow devices from the lead content verification testing. This revision also corrects the statement under 3.6 to state that the wetted surfaces of products shall have a weighted average lead content of less than or equal to 0.25 percent. Please refer to the comment and response letters 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
Tel: (734) 827-5643
E-mail mleslie@nsf.org

[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 (head).

— 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 or components exempted from formulation information requirements as allowed per Section 3.2, Note 1.

NOTE — To the maximum extent possible, lead should not be added as an intentional ingredient in any product covered by the scope of this standard. The exception above relative to materials and components exempt from formulation information requirements has only been included in recognition that the use of lead as an intentional additive is unable to be identified in cases where formulation information is not obtained.

3.6 ~~Weighted average lead~~ Lead content of products

With the exception of those exempted in the Safe Drinking Water Act of the United States, the wetted surfaces of products shall have a weighted average lead content less than or equal to 0.25 percent ~~Products being evaluated for weighted average lead content shall be~~ when evaluated in accordance with NSF/ANSI 372 – Drinking water system components – Lead content. For the purpose of this section, product shall refer to anything individually evaluated for compliance under the standard, including materials and components. Solders and fluxes shall have a lead content no more than 0.2 percent.

~~**3.6.1 Exceptions to the requirement for lead content verification testing**~~

~~High flow devices that are used exclusively at public water treatment facilities are exempt from the requirement for lead content verification testing. 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, nanofiltration technologies, reverse osmosis, and ultrafiltration technologies.~~

Reason: Revision requires all products to have a weighted average lead content < 0.25% and ensures that lead content verification is performed on all products (unless specifically exempted by US SDWA) as a means of an additionally verifying the intent of Section 3.5 . Additionally, the change would provide additional assurance that products comply with the US SDWA.

Revision 2: Removed proposal under 3.6.1 to exempt high flow devices from the lead content verification testing per comments received on revision 1 draft. Also corrected the statement under 3.6 to clarify that <u>the wetted surfaces</u> of products shall have a weighted average lead content of less than or equal to 0.25 percent.